

## Issues Paper Consultation Survey - public and attributed responses

### Topic 2 - Aboriginal and Torres Strait Islander Knowledge Systems

This document includes public and attributed responses to the following questions of the Issues Paper Consultation Survey

- Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?
- Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Please note

- Where necessary, text answers to the above questions have been redacted to remove contact details and third-party personal information
- blank submissions have been removed
- respondents who wished to remain anonymous are contained in the document "Anonymous responses to Issues Paper Consultation Survey"

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# 282

Fri, Dec 19, 2025, 12:40 PM Australian Eastern Daylight Time  
[ID: sbm39ca5c82480a48d32ad6d]

Title  
Ms

First Name  
Erin

Last Name  
Vest

Organisation  
Northern Australia Indigenous Reference Group

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

In northern Australia, future NRI investments should be designed to place high-quality, timely information in the hands of Indigenous decision-makers so they can steer governments and markets towards outcomes that build capability, reduce reliance and grow locally held assets.

The relevant starting point is the IRG's indicator frame: expansion of production, stabilisation of earned incomes and growth of locally held assets, with companion indicators for capability, resilience, institutional strength, ownership and substitution. Over the next 3-5 years, NRI should therefore:

- establish agreed purposes and indicator sets for Indigenous futures, aligned with the Framework for Governance of Indigenous Data and Closing the Gap Priority Reforms;
- configure integrated data flows across schooling, VET, higher education, employment, enterprise and infrastructure programs in the North; and
- support regular (e.g. quarterly and annual) reporting that enables Indigenous organisations and governments to see whether production, incomes and assets are moving together in the desired direction.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An appropriate balance is to position the Aboriginal and Torres Strait Islander Peoples Research Data Commons as the engine room for common metrics and data flows, with mainstream NRI expected to interoperate with, and contribute to, this capability.

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The Commons should:

- co-design and maintain core data models, indicators and time series for Indigenous wealth- and capability-building (production, incomes, assets, education-to-employment pipelines, enterprise dynamics, household resilience, institutional capacity and substitution);
- establish clear, up-front rules for ongoing administrative data supply from relevant systems (education, skills, employment, enterprise support, infrastructure programs); and
- embed Indigenous governance at the framework level so that routine data flows for agreed purposes do not require continual renegotiation.

Discipline- and theme-based NRI should then align their designs with these models where relevant and treat appropriate sharing as the default within agreed guardrails. In northern Australia, the IRG legacy mission and its measures should be treated as priority use-cases for the Commons.

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# 281

Thu, Dec 18, 2025, 10:19 AM Australian Eastern Daylight Time  
[ID: sbm39c4b57be092eff95521e]

Title  
Mr

First Name  
Richard

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Brinkman

Organisation  
AIMS

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Ensure NCIRS invested facilities proactively support First Nations partnerships, research and incorporate First Nations engagement strategies into their facility communications processes. First Nations partnerships rely on relationship building and so NCRIS should look to leverage existing partnerships established in associated government areas to extend or support the facility.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
A dedicated facility extending on existing TO relationships of its partners may have merit. For example, AIMS has invested years into its relationships with TO communities across tropical Australia and has incorporated First Nations science into the heart of our strategy. The trust needed to create true TO led science and western-sea country science partnerships takes time to build and requires sustained focus. It is recommended NCRIS leverage key partners with these relationships established in establishing any dedicated facility.

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# 280

Wed, Dec 17, 2025, 04:47 PM Australian Eastern Daylight Time  
[ID: sbm39c0f2481e2631f35ad9d]

Title  
Mr

First Name  
Daniel

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Blanket

Organisation  
Indigenous Business Australia (IBA)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

IBA endorses the approach outlined in the Issues Paper regarding the integration of Aboriginal and Torres Strait Islander and post-colonial knowledge systems. We agree that facilitating such collaborative integration requires uplift within and across existing NRI capabilities and associated expertise clusters, supported by committed multi-year investment. Specifically, IBA supports:

- Establishment of Aboriginal and Torres Strait Islander-controlled data repositories and catalogues implementing both FAIR (Findable, Accessible, Interoperable, Reusable) and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics) principles, with appropriate metadata standards to uphold Indigenous data governance.
- Provision of expert resources for managing, protecting, and sharing Aboriginal and Torres Strait Islander data to enable large-scale research, policy development, and community-driven on-Country initiatives.
- Responsible use of AI in research practices relevant to Aboriginal and Torres Strait Islander peoples, including tools designed for Indigenous languages and AI-supported provenance and metadata creation.
- Development and implementation of processes to embed Indigenous data governance and sovereignty protocols, as well as CARE principles, including ethics frameworks that prioritise community consent and benefit-sharing across all relevant NRI activities.

In addition, IBA recommends the following actions to ensure future NRI investments respect cultural protocols, support self-determination, and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data:

Short-term (1-3 years):

- Ensure Indigenous representation in decisions about future NRI investments, particularly those likely to affect Indigenous communities.

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- Appoint at least one Indigenous expert to the National Research Infrastructure Advisory Group.
- Share information about the National Collaborative Research Infrastructure Strategy (NCRIS) with Indigenous organisations (including Land Councils and Native Title Corporations), researchers, health organisations, and chambers of commerce.
- Deliver tailored information sessions for Indigenous stakeholders on NRI priorities and NCRIS guidelines.
- Require FPIC-based engagement for all NRI projects impacting Indigenous communities, with clear budget allocations for community engagement and capacity-building.
- Where desired by affected communities, establish Indigenous governance and benefit-sharing agreements with funding recipients.
- Invest in, or incentivise, training across the NRI workforce on culturally respectful engagement and FPIC principles, delivered by Indigenous experts.

Medium-term (3-5 years):

- Implement continuous improvement processes by consulting Indigenous communities engaged in NRI initiatives and incorporating feedback.

Long-term (5-10 years):

- Measure success using both quantitative and qualitative indicators, with qualitative measures designed through Indigenous-led research methodologies.

IBA's approach to research and impact measurement

IBA believes that understanding our impact must be grounded in an Indigenous context, with research principles designed and led by Indigenous peoples. Our Impact Framework, developed under the guidance of Indigenous evaluation expert Dr Kevin Dolman (Eastern Arrernte) draws on the Interplay Wellbeing Project. This is a model co-created with over 800 Aboriginal participants and supported by the Department of Prime Minister and Cabinet and Flinders University through CRC-REP. While not an exact replica, IBA's framework incorporates key elements of Interplay to strengthen culturally relevant impact measurement.

The framework enables IBA to assess the economic, social, and cultural impacts of our work at both customer and community levels. It uses indicators informed by Indigenous empowerment and wellbeing principles, alongside IBA's financial and non-financial datasets, to generate annual Impact Reports. These reports combine quantitative and qualitative data with stories that reflect the diverse cultures and experiences of Aboriginal and Torres Strait Islander peoples. All impact studies receive ethics approval from the AIATSIIS Research Ethics Committee.

IBA's approach prioritises:

- Indigenous Data Sovereignty through co-designed research methodologies with Indigenous-led governance groups, and engaging local Indigenous researchers.
- Use of CARE and FAIR principles to ensure knowledge is respected, attributed, and beneficial to its originators.
- Continuous feedback loops to communities and transparent reporting of outcomes they can use.

Future investments should embed these principles across all elements of the NRI and fund Indigenous-controlled research infrastructure. True self-determination means Indigenous peoples govern how their knowledge is collected, used, and shared. Respecting cultural protocols requires integrating Indigenous governance as a core design principle, not an adjunct to ethics. This approach aligns with national Indigenous policy frameworks, including the National Agreement on Closing the Gap, the Indigenous Evaluation Strategy, and the Framework for Governance of Indigenous Data.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

IBA recommends a complementary approach of investing in a both dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons and system-wide capability uplift. The Dedicated Data Commons and a system-wide capability uplift would be mutually reinforcing. The Commons would provide a central hub for culturally governed data and technical expertise, while system-wide capability uplift would ensure Indigenous knowledge systems and sector-specific expertise are embedded across all NRI facilities.

A Dedicated Data Commons would support uplift in capability across NRI facilities through shared standards, joint training initiatives, co-designed research methodologies, and data-sharing in line with the Framework for Governance of Indigenous Data.

One mechanism to enable cross-communication and cooperation could be the establishment of an advisory body, including Aboriginal and Torres Strait Islander experts and leaders, to oversee design, implementation, and compliance across both the Data Commons and capability uplift.

Recommendations for implementing the dedicated research data commons

- Build secure, culturally governed platform repositories managed with community permissions, local protocols, and metadata that acknowledges cultural ownership.
- Fund Indigenous data custodians and technicians to operate and maintain the Commons.
- Embed CARE and FAIR principles to ensure data is findable and reusable while prioritising collective benefit, authority to control, and ethics.

Recommendations for system-wide capability uplift

- Apply Indigenous governance principles across all NRI assets, facilities, services, and expertise, not just theme-oriented domains.
- Require all NRI facilities to adopt Indigenous Data Sovereignty protocols and FPIC principles.
- Tie investment to evidence of Indigenous partnership, CARE compliance, and benefit-sharing agreements for all NRI projects impacting Indigenous communities.
- Incentivise Indigenous employment across all levels of projects, including leadership, research, and operational roles.
- Apply Indigenous Data Sovereignty principles to legacy datasets held in collections, health services, land and water authorities, and institutional archives.

Indigenous knowledge systems are not a thematic niche. They are a foundational capability. Embedding them into the NRI would ensure Australia's research infrastructure reflects national priorities and global best practice, integrating the world's oldest living cultures with advanced technologies to drive innovation and excellence. This two-track design would position Australia as a leader in ethically grounded research governance and innovation.

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# 279

Tue, Dec 16, 2025, 04:41 PM Australian Eastern Daylight Time  
[ID: sbm39bbc62f6232d3e8641e3]

Title  
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Organisation  
AuScope Ltd

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Within the 2026 Roadmap, Indigenous Data Governance can be identified as a mandatory investment condition for NRI, encompassing cultural protocols, consent, access/reuse conditions, and benefit sharing (CARE principles), and applied to the comprehensive research and data lifecycle.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
A balance could be achieved with a dedicated Aboriginal and Torres Strait Islander-led Research Data Commons 'hub' and existing NRI capabilities 'spoke' model. The hub could provide decision-making rights, governance, protocols, and shared services; the spokes could provide access, staffing, and workflows to enhance existing capabilities and support the dedicated Indigenous-led Commons in its Indigenous-led and self-determined activities, goals, and aspirations.

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# 278

Mon, Dec 15, 2025, 11:25 AM Australian Eastern Daylight Time  
[ID: sbm3990e6ae8ee5be5d2df39]

Title  
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First Name  
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Regan

Organisation  
Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
We urge future NRI investments to recognise the extreme diversity and multidisciplinary nature of Indigenous Knowledge Systems (IKS). At AIATSIS, we aim to support participatory, collaborative and interdisciplinary research models to enable better research outcomes for and with communities, as we acknowledge that there is no 'one size fits all' approach that will uphold the respect of cultural protocols, support self-determination and promote benefit sharing.

We have several projects currently underway, each utilising a personalised approach to research to achieve project goals and uphold the above values and principles. These projects aim to promote understanding of diverse Aboriginal and Torres Strait Islander peoples' rights, knowledge, cultures and stories. Currently, the Fourth National Indigenous Languages Survey (NILS4) is underway, where we adopted a co-design approach with many Aboriginal and Torres Strait Islander individuals and communities, alongside researchers and institutions, to nurture culturally respectful relationships and ensure the protection of Indigenous Cultural and Intellectual Property (ICIP). Additionally, our Dictionaries program provides support and funding for communities working on language revival and maintenance, while supporting self-determination. We do not hold the copyright for any publication produced via this program. Lastly, we house an internationally recognised language database (AustLang). In our most recent update, we consulted and listened to feedback from Aboriginal and Torres Strait Islander communities, and individual and institutional users of the database, to ensure the useability, accessibility, and cultural appropriateness of the database.

We value the nurturing of deep two-way relationships with our partners, particularly with Aboriginal and Torres Strait Islander communities. A successful investment will be one

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built on the foundation of cultural capability, that supports ICIP and self-determination, and above all values collaboration with Aboriginal and Torres Strait Islander communities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability would be highly beneficial, however its purpose in addition to existing and emerging NRIs needs consideration. Collaboration, alignment and ongoing support should be a priority and accounted for in the planning of the facility. This will aid in the sharing of responsibilities and resources across institutions, which is integral in the provision of consistent and ongoing support to Aboriginal and Torres Strait Islander community initiatives.

To ensure the success and sustainability of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, it is critical that investment occurs at a national level. Nationally funded infrastructure would enable smaller institutions and community organisations—many of which hold collections of immense cultural and historical value—to participate fully in the broader research ecosystem. By embedding these organisations within a shared national framework, their collections can be preserved, digitised, and made accessible alongside those of larger institutions, ensuring equitable representation and strengthening the collective cultural record.

AIATSIS is an established institution with a strong foundation and reputation in this field. We have established relationships with Aboriginal and Torres Strait Islander communities and a network of cross-institutional relationships, which could directly benefit a stand-alone facility. Additionally, AIATSIS demonstrates by the following points from the Issues Report:

- The AIATSIS Collection and AustLang are Aboriginal and Torres Strait Islander-controlled data repositories that implement both FAIR (findable, accessible, interoperable and reusable) and CARE (collective benefit, authority to control, responsibility and ethics)
- AIATSIS is invested in resources for managing, protecting, and sharing Aboriginal and Torres Strait Islander data to facilitate large-scale research, policy development, and community-driven on-Country initiatives.
- The AIATSIS Code of Ethics prioritises community consent and benefit-sharing, and encourages the development and promulgation of processes to embed Aboriginal and Torres Strait Islander peoples' data governance and sovereignty protocols as well as CARE principles into all research into with Aboriginal and Torres Strait Islander community, culture and language.

The major limitation of current NRIs is the lack of sufficient funding and support. At AIATSIS, we steward a national collection, the operating of which requires specialised staff, facilities and equipment. We are committed to additional projects supporting language, research, and education, all of which require investment and support. As it stands, the lack of funding is preventing staff retention and the investment in new equipment and technologies to further achieve our goals. A future project would need to account for such issues, and should consider financial incentives, such as grants and co-investment across NRIs, to share in responsibilities.

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**# 277**

Fri, Dec 12, 2025, 04:55 PM Australian Eastern Daylight Time  
[ID: sbm39a6ef424bcc5a3c2e4ab]

Title  
Prof

First Name  
Michael

Last Name  
Dobbie

Organisation  
Phenomix Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
An NRI principle should obligate active consideration of possible appropriate insights from Indigenous knowledge where of potential beneficial for the research being conducted.

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# 276

Fri, Dec 12, 2025, 04:29 PM Australian Eastern Daylight Time  
[ID: sbm39a721e970b78419e5cc4]

Title  
Dr

First Name  
Sarah

Last Name  
Tynan

Organisation  
Science & Technology Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

This is a major area for focus and improvement in the research community; we as a community must do better in Indigenous research and in collaborations with Indigenous people and communities. However, the vast majority of 'investments' and actions needed are to do with the way research is undertaken, supported and funded, and not NRI per se. For example, implementation of new data standards, while ethical frameworks for managing data with Indigenous data sovereignty considerations and consent are certainly areas that NRI must engage with, they are a research sector-side consideration, with responsibility lying also with researchers and institutions not NRI.

Equally, the research community and institutions should deliver training to their staff and members on CARE/FAIR and in cultural competency as a standard institutional professional development responsibility - this is not a function for NRI to deliver, nor fund. However, given that financial levers and sanctions are often the most successful in changing culture, including in the research system, contractual and grant agreements are a way to drive positive change and uplift.

Grant and funding contracts could include a requirement for entities managing NRI to use and implement CARE/FAIR practices, with periodic audits to ensure compliance. Entities would also be required to ensure all researchers have undertaken training in and uphold set CARE/FAIR standards, with future access for researchers and their host institutions potentially terminated or sanctioned if these standards are not upheld.

There is a clear case for NRI to support Indigenous health data assets, including biobanks and digital infrastructure, that protect Indigenous cultural knowledge and intellectual property that ensure Indigenous-control and sound governance protocols and process.

Contractual arrangements (or ministerial expectations for PFRAs) could require NRI entities to have governance structures that include First Nations representatives on Boards, or dedicated First Nations advisory committees, where they don't already exist.

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# 275

Fri, Dec 12, 2025, 02:02 PM Australian Eastern Daylight Time  
[ID: sbm39a69b1bc7e160bfaf76b]

Title  
Mr

First Name  
Ross

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Latham

Organisation  
GLAM Peak

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
It is critical to ensure that Indigenous research infrastructure is holistic and co-created given Indigenous knowledge and and ways of being lose connection and meaning when knowledge is siloed and stored across non-Indigenous systems.

Currently, Australia has no connected research infrastructure that is able to appropriately connect and govern the access and use of Indigenous related collections.

In accordance with the Indigenous Data Sovereignty Principles, GLAM Peak endorses the establishment of dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability via:

- The creation of Aboriginal and Torres Strait Islander-controlled data repositories and catalogues that implement both FAIR and CARE principles with appropriate metadata standards to support Aboriginal and Torres Strait Islander data governance.
- Development of expert resources for managing, protecting, and sharing Aboriginal and Torres Strait Islander data to facilitate large-scale research, policy development, and community-driven on-Country initiatives.
- Development of tools and mandatory protocols to ensure AI is being used responsibly as a tool in research practices relevant to Aboriginal and Torres Strait Islander peoples
- Development and promulgation of processes to embed Aboriginal and Torres Strait Islander peoples data governance and sovereignty protocols as well as CARE principles,

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including ethics frameworks that prioritise community consent and benefit-sharing into the activities of all relevant NRI.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Achieving and maintaining such a balance requires an ongoing and collaborative approach as well as a sustainable funding model that is not limited to the funded life of a project or initiative.

The required capability could:

- Be developed in accordance with Indigenous leadership and the Indigenous Data Sovereignty Principles to ensure trust, control, and cultural safety.
- Provide shared services and products such as metadata standards, access protocols, and methods for digital storage, and stewardship that can be adopted sector-wide.
- Work as a hub and spoke model that potentially connects to other research systems and universities as appropriate and authorised by Aboriginal and Torres Strait Islander Peoples.
- Include partnerships and agreements set up with core and other research infrastructure providers to enhance cooperation and compliance with requirements for access and use.
- Be based on the ongoing availability of culturally safe training, guidance and support.
- Operate via joint governance arrangements, and shared performance indicators that measure both sector-wide uplift and Indigenous-specific outcomes.
- . Operate using interoperable technical standards wherever possible.

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# 273

Thu, Dec 11, 2025, 10:21 AM Australian Eastern Daylight Time  
[ID: sbm39a0aa2c95b73041fc8a6]

Title  
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Barceinas

Organisation  
Cooperative Research Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
CRA welcomes the strong foregrounding of Aboriginal and Torres Strait Islander knowledge systems. CRA emphasises that respect for cultural protocols, Indigenous data sovereignty and benefit-sharing must apply in perpetuity across all NRI investments. These are enduring obligations, not time-limited actions.

To implement this effectively, CRA supports a staged uplift:

- 0-2 years to audit, establish governance and workforce training: this should include protecting First Nations assets under First Nations authority and consulting existing governance frameworks such as the One Basin CRC 'Living Principles of Indigenous Data Governance' (IDG).
- 2-5 years to implement and scale: including co-designing sovereign digital infrastructures with First Nations support.
- 5+ years for maintenance: including embedding of First Nations' authority and shared governance as a standard.

We recommend maintaining co-design governance arrangements with Indigenous peak bodies and communities for all NRI investments involving Indigenous data or cultural knowledge and a baseline capability funding for Indigenous-governed NRI entities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

To balance targeted investment with system-wide uplift, CRA supports a dual-track approach with a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons (providing sovereign governance, secure repositories, culturally aligned

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metadata and AI tools) and capability uplift across all NRI providers. One Basin's approach of a layered distributed system model would support integration between sovereignty and scientific excellence.

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# 272

Tue, Dec 9, 2025, 04:06 PM Australian Eastern Daylight Time  
[ID: sbm39975be5d17c1c9e159d5]

Title  
Mr

First Name  
Andrew

Last Name  
Outhwaite

Organisation  
WA coastal RD&I survey respondents - this response is an aggregation and summary of the relevant responses from a coastal RD&I survey we conducted which received 42 responses from WA-based coastal researchers, innovators and managers.

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
From the 42 responses to our recent survey, there was strong support for elevating First Nations knowledge and leadership through activities including:  
- Prioritising and resourcing this, including resourcing Traditional Owners to meet the growing demand for their time and expertise. This includes helping coordinate TO priorities, connect TOs with R&D teams, support co-design processes for procuring funding, and provide mentoring support for emerging First Nations leaders.  
- Using a framework beginning with Time on Country to plan and design the data collection process with Elders, training for rangers in data collection, then working with rangers for ground-truthing the technology and interpretation with Elders and rangers through a cultural lens,  
- Engagement from the start, including first nations leadership and effective communication of how the knowledge can be integrated into the system we are all operating within,  
- Improve accessibility of First Nations expertise and support paid research positions for Indigenous high school and undergrad graduates: we need more Indigenous leaders coming proactively into universities and R&D environments, not just researchers going onto country.

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# 269

Tue, Dec 9, 2025, 12:35 PM Australian Eastern Daylight Time  
[ID: sbm3996d7fd699f477fc7935]

Title  
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First Name  
Warwick

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Dawson

Organisation  
University of Newcastle

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

- Early consultation is a critical element in framing investments, ensuring that Indigenous communities are empowered to make decisions rather than simply provide advice.
- A staged approach, focused on milestones rather than rigid timelines, can help guarantee that adequate consideration is given at each step.
- Establishing a national representative Indigenous governance body would provide overarching guidance and shape this important work, while still enabling place-based implementation that reflects local contexts and priorities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A possible model for both standalone and integrated data commons could draw inspiration from the Australian National F-12 Curriculum, where Aboriginal and Torres Strait Islander histories and cultures are recognised as a “cross-curriculum” priority and embedded across all Learning Areas. Similarly, a cross-disciplinary research model would allow the Aboriginal and Torres Strait Islander Peoples Research Data Commons to pursue its own priorities while acting as a central hub. This hub could foster dialogue, inclusion, and collaboration across disciplinary and theme-oriented areas, ensuring that Indigenous perspectives are integrated throughout the broader research landscape.

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# 265

Tue, Dec 9, 2025, 09:06 AM Australian Eastern Daylight Time  
[ID: sbm399619162787ecd113cff]

Title  
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First Name  
Chanel

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Beynon

Organisation  
Children's Cancer Institute

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Any future NRI investments must be grounded in the principles of self-determination, co-design, and cultural safety, ensuring Aboriginal and Torres Strait Islander peoples understand how biological materials are collected, stored, accessed, and used.

To achieve this, the following actions are recommended:

- Embed co-design and shared decision-making with Aboriginal and Torres Strait Islander communities from the earliest stages of any NRI initiative. This should include establishing formal partnerships with Indigenous-led organisations to guide governance, ethical frameworks, and implementation processes.
- Establish long-term funding for the Aboriginal and Torres Strait Islander Peoples Research Data Commons to ensure continuity, workforce capability, and genuine partnership rather than short-term engagement.
- Develop and operationalise a culturally appropriate data-sharing and consent framework that aligns with existing principles. This framework should include strong safeguards for privacy, ethical use, and community-driven consent processes.
- Empower and scale existing Indigenous-led initiatives, recognising their leadership in defining data sovereignty, cultural protocols, and benefit-sharing models across health research, including genomics.
- Ensure future NRI planning incorporates Indigenous genomics capabilities, acknowledging that genomics is a rapidly advancing and emerging field requiring culturally safe governance and equitable participation.
- Provide clear guidance on the responsible, transparent, and culturally safe use of artificial intelligence.

These measures should be embedded in the foreseeable future as core principles across all NRI planning and investment, supported by a sustained, long-term commitment to ensure meaningful and enduring impact.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A balanced, hybrid model is recommended to ensure Indigenous leadership is strengthened while maintaining flexibility across disciplines. Establishing a dedicated, Indigenous-led Data Commons would provide governance, training, and infrastructure under Aboriginal and Torres Strait Islander control, ensuring culturally appropriate data stewardship and capacity building.

At the same time, broader system-wide uplift should be applied proportionately, requiring NRI facilities to align with Indigenous data governance frameworks only where relevant, such as in areas involving Indigenous knowledge, participation, or the use of biological materials. This approach would prevent unnecessary administrative or compliance burden for disciplines where such engagement does not apply, while upholding integrity and respect where it does.

Incentives may also be established to foster collaboration between NRI facilities and Indigenous-led organisations, encouraging shared expertise, mutual capacity building, and long-term partnership development.

Overall, this balanced model would promote Indigenous data sovereignty and national capability uplift, while maintaining flexibility and relevance across the NRI system.

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# 263

Tue, Dec 9, 2025, 01:00 AM Australian Eastern Daylight Time  
[ID: sbm399339e3937cce80af176]

Title  
Ms

First Name  
Erika

Last Name  
Slavin

Organisation  
University of Western Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

As a research-intensive university committed to meaningful partnership with Aboriginal and Torres Strait Islander peoples, we welcome the opportunity to contribute to this critical area of NRI development. We recognise that universities have historically been part of the problem, holding Indigenous data without appropriate governance, conducting research that has not always served community interests, and contributing to what Professor Maggie Walter has termed "BADDR data" practices. We are committed to being part of the solution.

Future NRI investments should be guided by the five Maiam nayri Wingara Indigenous Data Sovereignty principles, which provide a robust framework developed by Aboriginal and Torres Strait Islander leaders. Genuine Indigenous Data Governance requires more than advisory structures or consultation. It requires governance arrangements where Aboriginal and Torres Strait Islander peoples hold decision-making authority throughout the data lifecycle.

We support the establishment of Indigenous governance mechanisms with substantive decision-making authority across all NRI providers. We recommend adopting CARE principles alongside FAIR, with CARE taking precedence for Indigenous data. We would welcome sector-wide guidance on auditing existing holdings and implementing free, prior and informed consent as standard practice. These are areas where we are undertaking our own institutional work and would value collaborative approaches.

Significant investment is needed in Indigenous data governance capacity at community and organisational levels. We see a valuable role for universities in partnering with communities and NRI facilities to support training in data literacy and Indigenous Data

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Sovereignty principles, while recognising that such programs must be Indigenous-led. Formal frameworks for protecting Indigenous Cultural and Intellectual Property should become standard across the sector.

We advocate for measures that support the growth and retention of an Indigenous workforce across the NRI network, particularly within technical, data stewardship, and research management roles.

We advocate for repatriation of Indigenous knowledge to become a core NRI function, supported by funding models that enable sustained relationship-building. Aboriginal and Torres Strait Islander communities should have genuine authority to shape research priorities. Universities are well-positioned to support this shift, and we welcome the opportunity to work collaboratively with government, NRI facilities, and Indigenous communities to realise this vision.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

We respectfully suggest reframing this question. Rather than seeking "balance" between two investment pathways, we propose an integrated architecture that places Indigenous governance at its centre while enabling collaboration across the NRI landscape. Indigenous data spans environmental, health, cultural, social, and economic domains. This is a reality that calls for coordinated rather than competing approaches.

We strongly support the establishment of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons. Such a capability would provide the sovereign space necessary for Indigenous data governance principles to be embedded from the outset, protect against the risk of Indigenous Data Sovereignty being co-opted within existing institutional structures, enable the paradigm shift from deficit-focused data practices to Indigenous-led approaches serving community priorities, and build the Indigenous data workforce that the entire sector needs. We would welcome the opportunity to partner with such a capability and to align our institutional practices with the standards it establishes.

We also recognise that a dedicated commons alone cannot meet the breadth of community data needs. Aboriginal and Torres Strait Islander communities engage across all research disciplines and require integrated data to address priorities spanning health, environment, education, culture, and economic development. Universities and discipline-specific NRI facilities must develop their own Indigenous governance capabilities, meeting standards set in partnership with the central commons.

We propose a hub-and-spoke model where the dedicated commons serves as the central node, setting standards, providing governance expertise, and building workforce capacity, while discipline-specific facilities maintain accountability relationships regarding their Indigenous data holdings. This approach would enable communities to access data held across multiple facilities while ensuring Indigenous governance of that access.

Achieving this vision requires substantial and sustained investment. The dedicated commons needs sufficient resourcing to establish credibility and capability. Discipline-specific uplift should be funded as a systemic requirement rather than competing with existing facility budgets. Direct investment in community-controlled organisations is essential. As a sector, universities stand ready to contribute to this national effort—we see ourselves as partners in building infrastructure that genuinely serves Aboriginal and Torres Strait Islander self-determination, and we are committed to the institutional transformation this will require of us.

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# 261

Mon, Dec 8, 2025, 09:16 PM Australian Eastern Daylight Time  
[ID: sbm39938f34b887b80a9f65e]

Title  
A/Prof

First Name  
Robyn

Last Name  
Schofield

Organisation  
The University of Melbourne

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Working on country training materials developed by the Australian Council of Environmental Deans and Directors as well as the Australian Council of the Deans of Science materials can enrich the training of researchers working in environmental and Earth sciences.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Our group has worked with the Murujuga Aboriginal Corporation (MAC) on the Murujuga Rock Art Monitoring program. The UNESCO application for inscription as a world heritage site included a sealed section of scared sites to protect and recognize Indigenous Knowledge and sites of significant cultural value. I suggest co-design with Aboriginal Corporations about protocols would be essential.

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# 260

Mon, Dec 8, 2025, 07:07 PM Australian Eastern Daylight Time  
[ID: sbm39931874e89f247a53eae]

Title  
Dr

First Name  
Benjamin

Last Name  
Padman

Organisation  
The Kids Institute

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
As a white middle-aged man, I feel under-qualified to comment on this topic.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
As a white middle-aged man, I feel under-qualified to comment on this topic.

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# 259

Mon, Dec 8, 2025, 06:44 PM Australian Eastern Daylight Time  
[ID: sbm39930401337c20d6a6bfc]

Title  
Dr

First Name  
Callum

Last Name  
Shakespeare

Organisation  
The Australian National University

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
No comment.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Given the cultural sensitivities, it would be far more efficient and effective to have a dedicated ATSI research data commons with relevant cultural expertise. It would be prohibitively expensive and inefficient to try to integrate this via 'uplift' (whatever that means) across all disciplines/entities in NRI. Instead, the dedicated ATSI entity should liaise with/support the other NRI entities where they are involved in work that is relevant to ATSI knowledge.

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# 258

Mon, Dec 8, 2025, 06:08 PM Australian Eastern Daylight Time  
[ID: sbm399170cccde5bb3b45a6e]

Title  
Ms

First Name  
Janet

Last Name  
Catterall

Organisation  
Open Access Australasia/Council of Australasian University Librarians (OAA/CAUL) joint submission

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Thousands of unique research materials are produced every year that are about or produced with Aboriginal and Torres Strait Islander Peoples. These materials - including theses, reports, but also other materials including research data, images, and other works, are made available via institutional and disciplinary repositories hosted at universities. However, as these systems and metadata schema are developed internationally, they lack attention to the access controls and protocols necessary to ensure that access to these outputs is in accordance with community expectations, including the CARE Principles for Indigenous Data Governance. Investment in systems and capabilities is needed to improve access controls, protocols, metadata, and preservation practices. Such investment is also necessary as a pre-requisite to the concept of a sovereign AI approach centred on Australian content.

It is essential to prioritize the development of Indigenous-led metadata standards and culturally aware access controls within these infrastructures. This includes collaborating with Aboriginal and Torres Strait Islander communities to embed the CARE Principles for Indigenous Data Governance into metadata schemas and access permissions. Capacity-building programs must also be funded to empower Indigenous peoples in governance and stewardship roles, alongside embedding shared open-source infrastructure designed from the outset to integrate Indigenous governance tools. Additionally, establishing Indigenous-led monitoring frameworks and clear evaluation metrics, with annual reporting from the first year, will ensure that cultural protocols, self-determination, and benefit sharing remain central throughout the roadmap cycle.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

As noted above research related to or produced with Aboriginal and Torres Strait Islander Peoples is produced and published in numerous research and educational institutions. As a result, there needs to be suitable capabilities across the sector in line with community, disciplinary, and institutional approaches to Indigenous Cultural and Intellectual Property (ICIP), scholarly publishing, research data, and related practices. In turn, strength across the disciplines and institutions will support a dedicated research data commons capability.

The capability could:

- Be developed with Indigenous leadership and incorporate sovereign data governance principles to ensure trust, control, and -cultural safety.
- Leadership roles should be embedded across all NRIs. Peak Indigenous organizations (e.g., Indigenous Data Network, Lowitja Institute, AIATSIS) alongside NRI directors and government data leaders are best placed to co-lead the design, standard-setting, and capability building, ensuring collective responsibility and practical implementation across the research infrastructure ecosystem.
- Collaboration and alignment can be driven through joint advisory groups, funding conditions tied to Indigenous data governance milestones, and shared national frameworks like the NIAA Governance Framework and CARE principles. ARDC's HASS & Indigenous Research Data Commons (HASS&I RDC), is an example of this model, co-designing with Indigenous communities acting as a bridge between dedicated Indigenous capabilities and broader NRI facilities.
- Provide shared services such as metadata standards, access protocols, and digital preservation that can be adopted sector-wide.
- Work as a hub that connects to many other research systems across universities  
Include partnerships and agreements set up with other research infrastructure providers to enhance cooperation
- Be based on interoperable technical standards and financed by coordinated funding incentives that encourage collaboration across themes
- Include capacity-building programs, joint governance arrangements, and shared performance indicators that measure both sector-wide uplift and Indigenous-specific outcomes.

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# 254

Mon, Dec 8, 2025, 05:26 PM Australian Eastern Daylight Time  
[ID: sbm39918441d2e551c8adc9b]

Title  
Prof

First Name  
Maggie Walter

Last Name  
Margaret Walter

Organisation  
Maiam nayri Wingara

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

**Submission - Maiam nayri Wingara Indigenous Data Sovereignty Collective**

This submission is from Maiam nayri Wingara (MnW), the peak body for Indigenous Data in Australia. MnW comprises 12 Aboriginal and Torres Strait Islander members who are experts in their respective data fields. Established in 2017, MnW has worked extensively on Indigenous Data Sovereignty (IDSov) and Indigenous Data Governance (IDGov), as evidenced by the dozens of publications and activities available on our website (Maiam nayri Wingara, 2025).

MnW initiated and convened the 2018 Indigenous Data Sovereignty Summit, where more than 40 Aboriginal and Torres Strait Islander delegates from across Australia developed the IDSov principles (Maiam nayri Wingara, 2018). In 2023, together with the Lowitja Institute and the Australian Indigenous Governance Institute, we led the Indigenous Data Governance Summit, attended by over 130 Aboriginal and Torres Strait Islander people, where the Australian requirements for IDGov were collectively established (Maiam nayri Wingara, 2023).

Maiam nayri Wingara is also an executive member of the Global Indigenous Data Alliance (GIDA; 2025). In 2025, MnW and GIDA co-hosted the Global Indigenous Data Sovereignty Conference, bringing together more than 250 Indigenous delegates from around the world. At the conference, our work was strongly reaffirmed by Aboriginal and Torres Strait Islander peoples and Indigenous peoples internationally. These ongoing affirmations, together with our scholarship and practical impact, confirm our authority as the Indigenous Data peak entity in Australia.

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In this submission, MnW responds to the 2026 National Research Infrastructure (NRI) Roadmap Issues Paper, specifically the section concerning Aboriginal and Torres Strait Islander data needs. The MnW collective:

- Strongly endorses the call for the creation of a dedicated Aboriginal and Torres Strait Islander Research Data Commons Capability.
- Strongly rejects the proposed scaling up of Improving Indigenous Research Capabilities (IIRC) and the Language Data Commons of Australia (LDAaCA) under the Australian Research Data Commons (ARDC) as an appropriate mechanism for establishing such a Capability.

Our primary objection is that the ARDC proposal does not constitute Indigenous research infrastructure. This is not a critique of the ARDC, or the excellent work undertaken by Indigenous scholars within IIRC and LDAaCA. Instead, it is a critique of funding Indigenous infrastructure through a non-Indigenous entity; an approach that neither supports self-determination nor strengthens Indigenous Knowledge Systems.

Our key reasons for rejecting the proposed ARDC expansion are twofold.

1. To be successful, an Aboriginal and Torres Strait Islander Research Data Commons Capability must be (i) independent of government, (ii) Indigenous-led, and (iii) controlled based on Indigenous Data Sovereignty principles.

Australia has a substantial cohort of First Peoples data scholars and data leaders who are willing and fully capable of advancing an Indigenous Research Data Commons Capability. Allocating this funding to the ARDC denies this expertise, undermines Indigenous capability, and risks reinforcing the very deficit data paradigms the Initiative seeks to address.

Funding the ARDC to develop an Indigenous Data Commons is inconsistent with:

- a. Indigenous Data Sovereignty principles endorsed by Aboriginal and Torres Strait Islander data leaders (see, Maiam nayri Wingara, 2018).
- b. Commonwealth government policy, particularly Priority Reform 4: Shared Access to Data, in the National Agreement on Closing the Gap (Commonwealth of Australia, 2020).
- c. Findings of the Productivity Commission's Review of Closing the Gap (2024), including Recommendation 2 regarding data reforms.
- d. Recommendations of the independent review into the implementation of the Priority Reforms, specifically Recommendation Seven on embedding Indigenous Data Sovereignty and Governance principles.

The ARDC's engagement of Aboriginal and Torres Strait Islander people into its programs does not resolve these structural concerns.

2. The NRI Issues Paper identifies several data-related needs and acknowledges that will require multi-year investment. We agree that the data capability needs of Aboriginal and Torres Strait Islander peoples are complex, multi-faceted, multi-level, and deeply interconnected. However, these needs cannot be addressed in isolation. An Indigenous Research Data Commons Capability must form part of a coherent, planned approach; not a separate or siloed initiative.

Foregrounding the funding the ARDC for achieving Indigenous Knowledges and Indigenous Data research infrastructure into the future, as this Issues Paper does, is deeply worrying.

Our key concern is that funding of the development of Indigenous Data Commons Capability within a non-Indigenous-led and non-Indigenous-controlled organisation will:

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- embed non-Indigenous leadership over Indigenous data requirements.
- result that the complex, interlinked Australian data requirements will be developed without overarching, coherent planning.
- undermine and negate the decade of Aboriginal and Torres Strait Islander led work and scholarship on Indigenous data.
- exclude, except perhaps as advisors, skilled First Peoples and Indigenous entities, such as MnW, from leadership roles and a meaningful process.
- produce an inconsistent, piecemeal, and atomised Indigenous data infrastructure that does not serve the interests of First Peoples.

This is not what we need. Instead, what is required is a process led by Indigenous data leadership to plan, map and implement appropriate Research Data Commons Capability.

Finally, in Appendix A, we include the submission by MnW members Walter and Lovett on the proposed Indigenous Data Authority; later renamed by the Productivity Commission as the Bureau of Indigenous Data (BoID). This proposal was submitted in November 2023 to the Productivity Commission's Review of Closing the Gap and outlines a model for an Indigenous Data Authority (see Walter and Lovett, Submission 94: <https://www.pc.gov.au/inquiries-and-research/closing-the-gap-review/submissions/>).  
**[Redacted - personal information not authorised for publication]**.

- Distinguished Professor Maggie Walter (Palawa; FASSA), University of Tasmania
- Professor Ray Lovett AM (Ngiyampaa/Wongaibon; FAHMS), Australian National University
- Associate Professor Jacob Prehn (Worimi), University of Tasmania
- Ms Bobby Maher (Yamatji, Noongar, Kija), Australian National University

Appendix A: Submitted to the Productivity Commission on 06/11/2023  
Concept Proposal: An Indigenous Data Authority  
Distinguished Professor Maggie Walter (Palawa), University of Tasmania  
Professor Ray Lovett (Ngiyampaa/Wongaibon), Australian National University

#### Background and Rationale

Aboriginal and Torres Strait Islander lives and futures are intricately entwined with data. Realisation of the tangible value of data to wellbeing has led First Nations to increasingly seek to access or develop disaggregated/local data resources that are reflective of Indigenous perspectives, priorities and needs and the capability to use these. The 2023 Indigenous Governance Summit, where more than 130 Aboriginal and Torres Strait Islander leaders agreed a set of Australian Indigenous data governance protocols to build on the Indigenous Data Sovereignty protocols established at the 2018 Summit (MnW 2018; 2023) demonstrate this growing recognition of the importance of data.

High quality, disaggregated, relevant data are also critical for government evidence-based policy development. Realisation of the 2020 National Agreement on Closing the Gap (CTG) is reliant on data. CTG explicitly recognises the centrality of data to its aims, stating: '[S]hared access to location specific data and information will support Aboriginal and Torres Strait Islander communities and organisations to support of the achievement of the first three Priority reforms'. Priority Reform Area 4 commits to: partnerships to guide the improved collection, access, management and use of data; community and organisational access to data; data disaggregation to a level to allow local decision making; the support of data capability and expertise within communities and organisations.

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Since the National Agreement came into force there has been some, albeit limited, advancement of Indigenous data accountabilities. The 2023 co-designed Framework on the Governance of Indigenous Data being finalised under the auspices of the National Indigenous Australians Agency (NIAA) (Richardson et al. 2023) is an example. There is also a stated and growing commitment to Indigenous Data Sovereignty and governance principles across government agencies.

Despite these innovations, the collection, collation, use and access to Indigenous data in Australia is without a coherent framework. Data responsibilities and processes, where they exist, are atomized. Responsibility for existing data obligations and new data development are split across multiple working groups and organisations. More critically these responsibilities are without clear accountabilities. This piecemeal, unstructured process reduces the possibility of achieving Closing the Gap data ambitions and overall objectives. The potential benefits and the potential risks for First Peoples from data technologies such as Big Data, Open Data and Artificial Intelligence magnify the urgency of the need for an independent Indigenous data infrastructure.

#### An Indigenous Data Authority Model

What is required is a coherent and consistent Aboriginal and Torres Strait Islander led infrastructure to support Aboriginal and Torres Strait Islander data needs, to support Government in meeting its CTG data obligations; to measure and evaluate progress under the Priority Reforms, and an agreed framework on which reporting can be based. To achieve these objectives, this paper proposes the establishment of an Indigenous Data Authority.

The proposal is informed by our own experience working in the Indigenous data space. It draws heavily on the Productivity Commission Review of the National Agreement on Closing the Gap Tracking progress Information paper 6 (2023) (PC Review). This paper notes that despite the commitments made under Pillar 4, no transformational change in government Indigenous data practices or processes have eventuated. The PC Review addresses this failure through Draft Recommendation 1, calling for the appointment of an entity with dedicated resourcing and staffing to lead CTG Agreement related data development.

We are also inspired by activity in other nation states with similar data/policy nexus issues. In Canada, the First Nations Indigenous Governance Centre released their First Nations Data Governance Strategy (2020). This strategy establishes a set of Indigenous led, expert driven, Regional Information Governance Centres across the nation to share data and provide statistical services to First Nations, communities, their governments, advocacy organizations and service delivery agencies(see <https://fnigc.ca/what-we-do/first-nations-data-governance-strategy/>). In Aotearoa New Zealand the Te Kāhui Raraunga - Māori Data Governance Model (2023) provides Māori framed guidance for the system-wide governance of Māori data. This report discusses system leadership to build on the current Mana Orite relationship agreement with the Iwi (tribal) chairs [https://www.kahuiraraunga.io/\\_files/ugd/b8e45c\\_803c03ffe532414183afcd8b9ced10dc.pdf](https://www.kahuiraraunga.io/_files/ugd/b8e45c_803c03ffe532414183afcd8b9ced10dc.pdf).

These models have salience for the Australia but are not directly translatable due to the differing Indigenous leadership models and Indigenous/Government relationships.

The proposed Indigenous led, Indigenous Data Authority (IDA) should be built around a hub and spokes model and be an independent statutory authority. Operationally, the IDA would provide Indigenous data services, support and innovation. It would also provide performance monitoring, fulfilling the urgent need identified by the PC Review to connect key CTG reform actions and outputs (See Point 6). IDA activities would be delivered from a

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central hub to First Nations, communities and peak bodies as well as to government entities. To ensure service access for First Nations' communities across Australia, the IDA hub would support a set of small on the ground regional/state based spokes.  
Potential roles and purposes of an Indigenous Data Authority

There is a broad array of Indigenous data needs, at the First Nation and at Government level, that could be addressed by the proposed IDA. Here we outline of number of potential Indigenous data linked roles, services, and activities.

### 1. Data and Indicator Development

The CTG Agreement has 19 national socio-economic targets and Clause 92 requires parties to establish a data development plan for each socio-economic outcome. But, as noted in the PC Review, progress on these has been very slow. Many requisite and critical data items do not yet exist, do not provide useful or appropriate measurement of the target, are not current, or cannot be sufficiently disaggregated.

An IDA could convene and facilitate data development as a function, including:

- identify, prioritise, modify, develop and test CTG indicators;
- determine and develop data disaggregation models to monitor progress at a regional level;
- in collaboration with Aboriginal and Torres Strait Islander communities and government agencies, develop and coordinate solutions for indicators without valid measures;
- provide advice to Aboriginal and Torres Strait Islander and government agencies on data and indicator development;
- developing an Indigenous data infrastructure and data repository that responds to community needs.

### 2. Facilitate Data Access for Aboriginal and Torres Strait Islander Communities

The CTG Agreement stipulates that First Peoples's communities and organisations share access to Government held disaggregated data as per:

Priority 1: To participate as equal partners with government in shared decision making;

Priority 2: For evidence-based decision on policy and programs at the local level; and

Priority 3: For accountability, measuring the transformation of government organisations.

To this end, 71 b) of Priority Reform 4, states that 'Governments agree to provide Aboriginal and Torres Strait Islander communities and organisations access to the same data and information on which any decisions are made...'. Despite this commitment, there is, as yet, no process by which First Peoples communities and organisations can activate this outcome.

The IDA could operate as a central entity, liaising with the appropriate agency to facilitate access. This function would provide Aboriginal and Torres Strait Islander communities and organisations with a clear process to:

- seek assistance with identifying the data that they need; and
- lodge data access requests.

### 3. Provide Governance of Data Support for Government Departments and Entities

Under 71c) of Priority Reform 4, governments commit to 'collect, handle, and report data at sufficient levels of disaggregation in an accessible and timely way. Yet, there is no existing entity capable of providing the necessary monitoring and support of government organisations to meet their governance obligations. Moreover, as noted by the PC Review, data governance arrangements could be improved by consolidating responsibility for coordinating new data development.

An IDA could support the implementation of Indigenous data governance through:

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- developing a national Indigenous data governance committee, with regional hubs, to oversee governance of Commonwealth and State held Indigenous data;
- providing support and expertise to government agencies on how they can meet their Indigenous data obligations;
- overseeing and monitoring government CTG Agreement data governance obligations;
- engaging with, and supporting, Aboriginal and Torres Strait Islander organisations on issues related to data governance.

4. Provide Data Infrastructure for Aboriginal and Torres Strait Islander Communities  
Indigenous data collection is within the remit of an array of government agencies, with primary responsibility resting with the Australian Bureau of Statistics. Such collections currently are inaccessible for many Indigenous communities (see Point 2). Yet, even where access is given, many communities do not have the data infrastructure to be able to safely and securely store these data assets. The same safe storage limitations apply to data that are collected or collated by organisations and communities themselves.

An IDA could establish an Indigenous data repository, set up to receive and hold Indigenous data resources on behalf of communities under terms and conditions that uphold their Indigenous Data Sovereignty rights.

5. Provide Data Capability Support

It is recognised that public sector capabilities relating to Indigenous Data Sovereignty and Governance requires development. An IDA could provide guidance to agencies including:

- professional development including workshops on the fundamentals of Indigenous data sovereignty and governance;
- establishing Indigenous Data Governance mechanisms; and
- provide advice and assistance on data sharing and repatriation agreements.

Additionally, there is a need to ensure that Indigenous communities have the capability to engage in determining, collecting and governing their own data. An Indigenous Data Authority could provide guidance and professional services on:

- building data literacy and practice;
- supporting data asset mapping;
- establishing community based data sharing agreements;
- establishing local community data governance systems; and
- providing data analysis and interpretations skills training.

6. Provide Independent Performance Monitoring

PC Review, Draft Recommendation 1 (2023: 10) calls for the appointing of an organisation to lead data development. The first responsibility of such an organisation is listed as:

- to develop a shared understanding and explicitly articulate a conceptual logic underpinning the performance monitoring approach (highlight in original). This should connect key reform actions and outputs under the Priority Reforms to the resulting intermediate outcomes intended to drive improvements in Aboriginal and Torres Strait Islander life outcomes. Intermediate outcomes should include common drivers of change across the socioeconomic outcomes, where appropriate.

The IDA could fulfil this function.

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Retrieved from <https://www.pc.gov.au/inquiries-and-research/closing-the-gap-review/report/>.

Richardson, G., Jackson, R., Prehn, J., & Hartmann, J. (2023). Framework for Governance of Indigenous Data: Practical guidance for the Australian Public Service. Australian Federal Government

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

See above

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# 253

Mon, Dec 8, 2025, 05:26 PM Australian Eastern Daylight Time  
[ID: sbm3992bbf69e9f6ddb69ea2]

Title  
Dr

First Name  
Talía

Last Name  
Avrahamzon

Organisation  
Research Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Research Australia unequivocally supports the immediate development and swift adoption of dedicated measures to ensure future NRI investments respect cultural protocols, and support self-determination and benefit sharing. Many Indigenous-led established mechanisms, governance structures, organisations and processes exist within the health and medical research sector and across other sectors. These include but are not limited to, The National Indigenous Health Leadership Alliance (NIHLA), The Maiam nayri Wingara Indigenous Data Sovereignty collective and The Mayi Kuwayu Study. Consultation with, and guidance from, Aboriginal and Torres Strait Islander-led initiatives should be prioritised to ensure NRI investments meet the above criteria while minimising duplicative practice given the established activity in this field.

In addition, the international and national policy landscape of both the UNDRIP (including recent Sessions of the UN Permanent Forum on Indigenous Issues (UNPFII)) focussing on Indigenous determinants of health and Closing the Gap National Agreement, offer frameworks for ensuring genuine partnerships and self-determination, including in research activities. The operationalisation of these frameworks, including within the upcoming National Health and Medical Research Strategy, is critical for addressing health gaps through research infrastructure investment while ensuring the fulfilment of international commitments to Indigenous rights, equity, and sustainable development.

Research Australia strongly endorses applying the principle of self-determination into practice for government programs, and view this as a critical enabler to a whole-of-systems approach to elevating Indigenous knowledge systems and ultimately improving health outcomes for Aboriginal and Torres Strait Islander peoples. The Productivity Commission's 2024 review of the National Agreement on Closing the Gap called for greater

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government power sharing by treating Aboriginal Community-Controlled Organisations (ACCOs) as essential partners in program and service design and delivery, not simply as funding recipients. This has set the basis for subsequent grant opportunities, such as the current MRFF Indigenous Health Research Fund grant round. ACCOs should therefore have a greater role as administering organisations of grant funding. This should be leveraged alongside sustained and sufficient research infrastructure investment which adequately supports the integration and advancement of Aboriginal and Torres Strait Islander knowledge systems, underpinned by community leadership and genuine partnerships.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

In-line with the response to question 2, the principle of self-determination must be applied when determining an appropriate balance between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI. Indigenous leadership and governance are paramount and must be embedded across the system and underpinned by sufficient investment.

Some considerations which could be explored with Indigenous leadership at the centre is a focus on integration pathways and the flow of knowledge, standards and cultural protocols between a Data Commons capability and the broader NRI ecosystem, based on avoiding duplication and fragmentation. Ensuring adequate integration pathways between an Indigenous-led capability and the broader ecosystem may require novel and dedicated infrastructure investment to ensure effective coordination and alignment across expertise clusters.

Adopting a more culturally inclusive method of research and data, one which is grounded in community, will ultimately give more voice to First Nations people and in turn help shape a stronger understanding of the barriers, systemic issues faced and their potential solutions. While dedicated First Nations data capability is critical, it must be complemented by datasets that integrate other priority population groups to reflect the intersectional drivers of poorer health outcomes - including and not limited to First Nations led definitions of disability, sex and gender, location, sexuality. Strengthening NRI with robust, cross-sectional data will allow a fuller understanding of how multiple forms of disadvantage interact, in order to then develop health, wellbeing and medical responses that enable more equitable and effective health and wellbeing responses

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# 251

Mon, Dec 8, 2025, 05:24 PM Australian Eastern Daylight Time  
[ID: sbm3992ba627d878d0ff938a]

Title  
Dr

First Name  
Stuart

Last Name  
Glover

Organisation  
Australian Publishers Association

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Future NRI investment should be built from the outset on Indigenous Data Governance and Indigenous Data Sovereignty principles, aligned with the Framework for Governance of Indigenous Data and ICIP protocols.

APA supports:

mandatory Indigenous data and governance impact assessments for new NRI

an audit of existing NRI to identify reparative work required

a time-bound transition (e.g. two years) for existing facilities to demonstrate alignment

resourcing of best-practice Indigenous-controlled exemplars and ensuring their accessibility to communities.

Approaches must be locally responsive: no one-size-fits-all model will be appropriate across all Aboriginal and Torres Strait Islander communities or domains, including literary and cultural data.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Both are necessary and complementary. A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons is important as a visible, Indigenous-controlled capability and focal point.

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However, Indigenous data and knowledges intersect with all domains, including humanities, social sciences and creative arts. Uplift must therefore occur across the breadth of NRI capabilities, with:

\*\*Aboriginal and Torres Strait Islander leadership and advisory structures embedded in existing facilities

\*\*shared tools, standards and protocols (FAIR + CARE, ICIP) across the system

\*\*incentives for collaboration between the dedicated Commons and discipline/thematic NRIs.

This avoids siloing Indigenous knowledge and ensures system-wide cultural safety and relevance.

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# 246

Mon, Dec 8, 2025, 05:03 PM Australian Eastern Daylight Time  
[ID: sbm3992a7c4567c4b5088a27]

Title

Other: "Distinguished Professor"

First Name

Calum

Last Name

Drummond

Organisation

RMIT University

In what capacity are you responding?

A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

RMIT is strongly committed to pursuing excellence in Aboriginal and Torres Strait Islander (Indigenous) research and creating positive impact with integrity that is Indigenous led, engages meaningfully with and is of benefit to Aboriginal and Torres Strait Islander peoples. In this sense, the AIATSIS Code of Ethics for Aboriginal and Torres Strait Island Research (AIATSIS Code of Ethics, 2020) outlines the ethical and Responsible Practice of research at RMIT. In our view, Australia can ensure that the 2026 NRI Roadmap supports Aboriginal and Torres Strait Islander research on digital platforms, services and sensors by providing Indigenous researchers with access to independent collection tools and methods for conducting research with Indigenous communities. We should also ensure that we prioritise interdisciplinary approaches and support Indigenous-led frameworks and data governance principles.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Our stakeholders strongly support investment in an Aboriginal and Torres Strait Islander Research Data Commons (ATSIRDC) as a dedicated NCRIS facility as a recommendation in the 2026 Roadmap for implementation in 2028-2033.

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# 245

Mon, Dec 8, 2025, 04:59 PM Australian Eastern Daylight Time  
[ID: sbm3992a3c0c07c2f5baf718]

Title  
Dr

First Name  
Kylie

Last Name  
Brass

Organisation  
Australian Academy of the Humanities

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

The Australian Academy of the Humanities views the development of a systemic Indigenous Capability as a priority for the 2026 NRI Roadmap. As we did in March 2025, we support a "dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability", which as the Issues Paper articulates "would require scaling up from the Improving Indigenous Research Capabilities (IIRC) Language Data Commons of Australia (LDaCA) programs currently established under the Australian Research Data Commons (ARDC), and should draw on related collaborative initiatives hosted by various institutions."

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Realising an Indigenous Capability of the scale and scope of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability (see our response to Q2 above), is of value to humanities researchers Indigenous and non-Indigenous, including archaeologists, historians, and linguists, who work with Aboriginal and Torres Strait Islander cultural, heritage and language data. There is already productive overlap between the IIRC and LDaCA and other projects through the HASS&I RDC. A dedicated capability -- building on the IIRC -- provides the scale, visibility, and coordinating framework needed to draw on a range of related initiatives and infrastructures. In this way an Indigenous capability shares some of the functional aspects of humanities, arts and social sciences (HASS) more broadly because there is a great array of nationally significant research infrastructure which is widely distributed which a 'commons' governance can bring together.

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# 244

Mon, Dec 8, 2025, 04:57 PM Australian Eastern Daylight Time  
[ID: sbm39821cde8b8012ffd6281]

Title  
Dr

First Name  
Janet

Last Name  
Yeo

Organisation  
ATN Universities

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

ATN Universities supports the principle that NRI investments must respect Indigenous data sovereignty and be consistent with the Australian Government's Framework for Governance of Indigenous Data. This includes ensuring Indigenous-led governance and culturally safe approaches in all capabilities involving Indigenous knowledge or data, and ensuring that Aboriginal and Torres Strait Islander stakeholders help shape priorities, design decisions and access arrangements.

Strengthening these elements will support more appropriate, trusted and effective NRI design and will enable Indigenous communities to participate on their own terms. It will also improve the quality, legitimacy and long-term sustainability of national research infrastructure that draws on Indigenous knowledge or engages with Indigenous data.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

ATN Universities supports a coordinated, networked approach that builds on existing national data capabilities, such as those supported through Australian Research Data Commons (ARDC), while ensuring that any Indigenous-focused capability is Indigenous-led and reflects community expectations.

To avoid duplication and fragmentation, capabilities could be embedded across relevant discipline and theme-oriented NRI facilities rather than operating in isolation. Mechanisms to encourage alignment and collaboration across NRI providers would be valuable, particularly where Indigenous data intersects with health, environmental, social science

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and humanities research. Ensuring this occurs from the outset will also help avoid duplication or approaches that are inconsistent with Indigenous expectations.

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# 241

Mon, Dec 8, 2025, 04:48 PM Australian Eastern Daylight Time  
[ID: sbm3992635109cc268517344]

Title  
A/Prof

First Name  
Elizabeth

Last Name  
Williams

Organisation  
Australian Nuclear Research and Education Network

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
ANREN members deliver teaching, research and workforce development across science and engineering, and many ANREN activities intersect with Country, cultural heritage, and communities (education outreach, field work, environmental monitoring, workforce pipelines). Ensuring NRI respects cultural protocols and Indigenous data governance is essential to maintain social licence, safeguard community knowledge, and secure long-term access to on-Country research opportunities required for sovereign capability building. ANREN supports the Issues Paper's emphasis on a dedicated Data Commons plus capability uplift across existing NRI providers.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
ANREN's community is inclusive of all disciplines relevant to nuclear technologies, and our networked education model shows that education + applied research + short courses produce workforce pipelines that scale. Where need and expertise align, ANREN can host or partner on humanities-oriented training for generalists (e.g., ethics, cultural protocols, social license) while advocating for specialist positions where depth is essential (collections, Indigenous data governance). This mirrors ANREN's approach to building sovereign capability in nuclear domains where specialist expertise is non-substitutable but cross-domain facilitators are also required.

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# 239

Mon, Dec 8, 2025, 04:38 PM Australian Eastern Daylight Time  
[ID: sbm3992907a2487bb504e518]

Title  
Mrs

First Name  
Rosie

Last Name  
Hicks

Organisation  
Australian Research Data Commons

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
ARDC supports the two complementary trajectories identified in the 2026 NRI Roadmap Issues Paper: establishment of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability; and uplift across existing NRI capabilities.

In particular, uplifting Indigenous Data Governance (IDG) across NRI, including resourcing workforce and community capacity-building activities, will ensure future NRI investments support the recognition and elevation of Aboriginal and Torres Strait Islander knowledge systems in research.

ARDC proposes two approaches for strengthening IDG in NCRIS facilities:

#### INDIGENOUS PRACTITIONERS

NCRIS facilities are working with many Indigenous communities on projects across health, social sciences and environment. However, the facilities do not have the necessary capability to respond appropriately. For example, there is an urgent need for Indigenous data practitioners to support the implementation of CARE, Indigenous Data Governance, and sovereignty principles during the development, maintenance and use of large, de-identified health data assets developed under waivers of consent in Australia (per Guidelines approved under Section 95A of the Privacy Act 1988).

Indigenous-identified positions, such as Program Managers and Indigenous Data Stewardship roles, should be resourced to ensure CARE-aligned outcomes are achieved in all NCRIS organisations. An Indigenous Program Managers Working Group, facilitated by an Aboriginal and Torres Strait Islander Peoples Research Data Commons, would provide a forum to share learnings and disseminate research community impact initiatives across the

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NCRIS network. This will promote consistency in the application of IDG across the NCRIS network, and provide institutional support mechanisms for Indigenous staff of non-Indigenous NCRIS organisations.

**CARE-ALIGNED KPIS**

Embedding CARE-aligned KPIS, outcomes and indicators as a funding requirement under NCRIS - and reviewing CARE-aligned activities to ensure NRIs are supported to achieve their KPIS - will enable non-Indigenous organisations to undertake and demonstrate effective IDG.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons (RDC) capability would support improvements on Indigenous Australian matters. Establishing a standalone facility will empower invested parties - including researchers, stewards and custodians of Indigenous data, and the broader Indigenous community - and focus existing efforts into a nationally coherent program aligned to NRI Roadmap objectives. Investing in the uplift of Indigenous Data Governance (IDG) across NCRIS facilities should occur in parallel with the establishment of a standalone facility.

An Indigenous-led RDC could have a national coordinating role to ensure IDG is effectively reflected across all research disciplines. For example, there is an identified need for the development of approaches that appropriately balance the competing interests of conducting research - including compiling aggregate de-identified statistics relevant to public health and safety - with the need for Aboriginal and Torres Strait Islander people to be able to: meaningfully provide and withdraw consent for the use of their health data; control the use of their health data for their benefit; and know that their health data is contextualised and able to be disaggregated.

ARDC proposes the following principles be considered in identifying a suitable lead agency to establish an Indigenous-led RDC:

- National reach and footprint
- Representative and reflective of broad community views
- Track record of delivery and consensus building
- Availability of resources, expertise and capacity to deliver on an agreed agenda.

To determine existing IDG requirements - and to ensure the facility is equipped to determine and deliver its own objectives, while supporting other NRI IDG needs - establishment should include a scoping study, identifying:

- Current IDG frameworks and approaches across NRI
- Current and planned IDG implementation activities, and barriers to improving IDG
- NRI ability to engage with IDG capacity enhancement.

Scoping study recommendations could include:

- Activities that would create the greatest improvements in IDG across Australia's NRI
- Pathways for engagement with a standalone facility to avoid overwhelming that facility
- Leadership expectations for a standalone facility to encourage other NRI to build their own IDG capacity and expand relationships with their Indigenous stakeholders.

It is expected that a scoping study would take the first 2.5 years.

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**# 238**

Mon, Dec 8, 2025, 04:36 PM Australian Eastern Daylight Time  
[ID: sbm39928f12e487f43459169]

Title  
A/Prof

First Name  
Graeme

Last Name  
Hart

Organisation  
ARDC / University of Melbourne / Austin Hospital

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
**Support development of a unified voice for indigenous data governance together with funding for time spent and training of representative individuals**

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# 236

Mon, Dec 8, 2025, 04:31 PM Australian Eastern Daylight Time  
[ID: sbm39928a43167cd24b77883]

Title  
Mr

First Name  
Jarrod

Last Name  
Ross

Organisation  
Universities Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

**Respect cultural protocols**

- Recognise, amplify and action key existing and applicable protocols, principles, policies and frameworks such as AIATSIS Code, CARE principles, Indigenous Cultural and Intellectual Property rights and Maïam nayri Wingara principles, Indigenous Data Sovereignty and Stewardship principles and UN Declaration on the Rights of Indigenous Peoples.
- Culturally appropriate data repositories that implement FAIR and CARE principles require Indigenous community-controlled access systems, metadata for Indigenous rights and protocols, data integration capabilities that maintain community control, and long-term preservation infrastructure.

**Support self determination**

- Universities support Indigenous Self Determination through dedicated policy, strategy and planning.
- Indigenous leadership, governance and partnerships drive the exercising of self determination through a rights driven agenda and in support of the aspirations and priorities of partner practitioners, communities, organisations, clans, tribes and nations.
- Data Infrastructures provide support and operationalise existing research/university agreements with Indigenous peoples and communities, enabling diverse governance arrangements, consent mechanisms and Indigenous Data Governance arrangements.

**Promote benefit sharing**

- Benefit sharing is embedded in a range of Indigenous research approaches and processes such as ethics and agreement making.

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- Improving and adapting existing benefit sharing processes in the context of NRI requires a concerted mapping and identifying of new data management challenges and risks in order to shape up future proof solutions.
- A priority focus area for benefit sharing is the need for more effective resourced solutions that enhance self-determined Indigenous community data related capabilities
- Benefit sharing requires investment in infrastructure for the appropriate handling of Indigenous research data, including support for Indigenous communities to have access, ownership and control of data on Country.

What are the timelines for implementation?

- Institutions such as Universities are best served through dedicated resourcing and development of maturity models for Indigenous Data Sovereignty and Stewardship.
- Maturity models require significant resources and planning. Factors influencing the scope of maturity models include: Indigenous leadership and institutional expertise, technical capacity uplift and strategic alignment with University priorities, resourcing and allocation of workload across complex teams and workflows.
- Legislative reform is vital to ensure the long-term protection of Indigenous data. Agreement making principles consistent with the Framework for Governance of Indigenous Data need to be embedded across the life-cycle of data management, including practices for data disposal or long-term preservation. Key legislation including the Federal Archives Act (1983) requires reform to protect Indigenous rights in data.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Balancing Aboriginal and Torres Strait Islander Peoples Research Data Commons capability with provision of uplift in capability across relevant discipline and theme-oriented NRI: Specific initiatives

- Key disciplinary areas and government funding regimes require unique investment for enhancing capability to progress Indigenous Science solutions see Prof Brad Moggridge' NRI survey submission 244.
- Supporting Indigenous led community partnered pilot projects would allow for user testing of data infrastructure and allow for quick response lessons for broader implementation at a community level.
- University audits to identify at-risk Indigenous data collections, particularly nationally significant research collections not currently supported by university or institutional repositories and vulnerable to loss, and provide necessary support for their preservation.
- The protection of Indigenous knowledge is critical for Indigenous Data Sovereignty, as such practical implementation of ICIP through a right driven approach is one of the essential components of this work.
- University Libraries and key specialist data teams are valuable and practical resource hubs for building capability and educational experiences for key stakeholders.
- Tools for the curation and care of Indigenous data collections (see for example the Mukurtu Content Management, Local Contexts project, ATSIILIRN Protocols for Libraries, Archives and Information Services) have been developed and models tested. These capabilities could be expanded and utilised within NRI.
- Investment in training for Indigenous data and information workers to build support for implementation of tools, particularly within university libraries.

On developing Research Data Commons

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- Development of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons will assist with the scope and implementation of national commitments for greater Indigenous data governance measures such as those found in the National Agreement on Closing the Gap.
- A partnered model for a Research Data Commons could involve key Universities for greater success in high impact areas. Universities are implementing best practices in knowledge sharing and Indigenous governance and as such have established trusted partnerships to grow and elevate principles and practices of Indigenous Data Sovereignty in various industry and community contexts.

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# 235

Mon, Dec 8, 2025, 04:31 PM Australian Eastern Daylight Time  
[ID: sbm39928a00c18781563c360]

Title  
Prof

First Name  
Julian

Last Name  
Thomas

Organisation  
Australian Internet Observatory

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Australia can ensure that the NRI Roadmap supports Aboriginal and Torres Strait Islander research infrastructure needs by working with Indigenous researchers and knowledge system experts and community members to develop appropriate strategies and frameworks for implementing cultural protocols across the NRI ecosystem. It should also prioritise interdisciplinary and cross sector approaches, incorporating collecting institutions and supporting Indigenous-led frameworks and data governance principles. This should be implemented as soon as practicable.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
To support Indigenous data governance, protect cultural heritage, and integrate Indigenous knowledge into research, significant investment in long-term research infrastructure is required. The Australian Internet Observatory strongly supports investment in an Aboriginal and Torres Strait Islander Research Data Commons (ATSIRDC) as a dedicated NCRIS facility as a recommendation in the 2026 Roadmap.

Indigenous research data is located across all academic disciplines, including health and medicine, environmental science and ecology, social sciences, law and policy, arts and humanities, education and technology and innovation. Given its breadth, it is inherently interdisciplinary and intersects with all research communities across Australia. A new National Research Infrastructure (NRI) capability is required to support cross sector and multidisciplinary research and data sources. This would build on the work already undertaken by the Indigenous Data Network at the University of Melbourne, the ARDC

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HASS&I 'Improving Indigenous Research Capabilities (IIRC)' focus area and many other Indigenous research and collecting organisations.

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# 234

Mon, Dec 8, 2025, 04:22 PM Australian Eastern Daylight Time  
[ID: sbm399281fb72874b1789f7c]

Title  
Prof

First Name  
Bradley John

Last Name  
Evans

Organisation  
The University of New England

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

In the 0-2 year period, all relevant NRIs should be required to develop and implement Indigenous data governance plans aligned with the Australian Government's Framework for Governance of Indigenous Data, with Indigenous representation in governance structures and standard templates for consent. In the 2-5 year period, these arrangements should be supported by a national Aboriginal and Torres Strait Islander Peoples Research Data Commons, and by funded Indigenous data steward roles embedded across major NRIs. Place based exemplars are critical: UNE ASPIRE, as a proposed NCRIS capability, is working with Traditional Owners on Anaiwan food bowls, using repeat imaging to monitor Indigenous "biobanks" under Indigenous controlled agreements, demonstrating how NRI can respect cultural protocols, support self determination and deliver tangible cultural, environmental and economic benefits.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A hybrid model is required. A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons should provide an Indigenous governed environment, standards and tools for managing data about Country, people and knowledge. In parallel, all relevant NRIs should be required, through funding conditions, to align with these standards, co design Indigenous data governance plans, and resource Indigenous engagement and benefit sharing. Mechanisms such as joint programs, shared Indigenous data steward positions and interoperable APIs will ensure alignment. In this model, data and governance for Indigenous focused activities (e.g. UNE ASPIRE's long term imaging of Anaiwan food bowls and billabongs) are anchored in the Commons, while discipline NRIs systematically uplift their practice to meet national priorities as they emerge.

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# 233

Mon, Dec 8, 2025, 04:20 PM Australian Eastern Daylight Time  
[ID: sbm398ee2ff90a69f7652c44]

Title  
Dr

First Name  
Merran

Last Name  
Smith

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

The Issues Paper recognises the need for coordination within and across existing NRI capabilities and expertise clusters. It also recognises that this will require multi-year investment across multiple NRI providers. The need for coordinated multi-year investment across providers is supported. This is particularly important for biobanking and for other health and human services NRI.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An uplift in capability across existing capabilities and expertise clusters is considered a priority. A multi-year investment program that enables this uplift is needed. While a dedicated capability may be helpful, direct investment at the individual NRI and/or NRI cluster level will be essential to achieve the necessary engagement with Aboriginal and Torres Strait Islander Peoples.

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# 231

Mon, Dec 8, 2025, 04:17 PM Australian Eastern Daylight Time  
[ID: sbm39927d773b875a8460ca6]

Title  
Prof

First Name  
Devanshi

Last Name  
Seth

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Promote higher education and research through co-designing indigenous knowledge; Set target number of indigenous higher degree students with success oriented outcomes. Maintain respect, enhance cultural safety, mindful of sensitive language and create support networks. Need metrics to measure outcomes and outputs in 3-5 year time frames.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
A genuine commitment to Aboriginal and Torres Strait Islander health requires sustained investment and co-design of research infrastructure with communities. Valuing and integrating Indigenous knowledge systems alongside Western science strengthens research quality, trust and relevance. Making genetic and other health data accessible, governed by Indigenous peoples, is essential to deliver culturally safe innovation that improves health outcomes and extends health-span for current and future generations. Co-design database capabilities around the rich heritage of indigenous/first nations people with due legal, ethical and cultural sensitivities.

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# 229

Mon, Dec 8, 2025, 04:14 PM Australian Eastern Daylight Time  
[ID: sbm39927a2c339fdf12aa016]

Title  
Dr

First Name  
Markus

Last Name  
Herderich

Organisation  
The Australian Wine Research Institute (AWRI)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
To ensure future NRI investments respect cultural protocols and support benefit sharing, practical steps may include embedding Free, Prior and Informed Consent (FPIC) principles into all service projects, as well as ensuring shared decision-making in research that affects First Nations peoples and communities. This would involve strengthening First Nations' data sovereignty and governance to ensure communities can control and utilise data relevant to their needs and priorities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Focused investment could be considered in the Humanities to develop a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability. For facilities and projects in the STEM, Environmental and Biomedical areas a comprehensive uplift of data and meta data management could be considered, with the aim of embedding FPIC principles more broadly and strengthening First Nations data sovereignty, community involvement and benefit sharing.

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Department of Education

# 228

Mon, Dec 8, 2025, 04:07 PM Australian Eastern Daylight Time  
[ID: sbm39927460d3cc363a0a2ad]

Title  
Dr

First Name  
Michael

Last Name  
Banazis

Organisation  
Western Australian Department of Energy and Economic Diversification

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

- Targeted training opportunities to build expertise in data science (capture and management) can encourage participation in projects and promote self-determination by Aboriginal people. There may be scope to build on the environmental monitoring and data collection expertise and capabilities developed by Aboriginal people and communities through partnership programs such as National Environmental Science Program, Australian Institute of Marine Science and State and National Ranger Programs.
- To promote and support benefit sharing, capacity building for Aboriginal representative organisations and bodies and/or greater access to expert services is required to enable Aboriginal people to negotiate on an equal footing with researchers, government and industry. In considering benefit sharing opportunities there should also be mechanisms to ensure Aboriginal people have access to and rights to use any data arising from the research activities, and capacity building and/or access to expert services to assist in their utilisation of such data.
- Embed culturally appropriate engagement protocols, such as Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATIS) Code of Ethics for Aboriginal and Torres Strait Islander Research, in all programs.

The above suggestions align with Actions 1.6 (Talent, skills and workforce Priority Action Area) and 4.6 (Leadership, collaboration and communication Priority Action Area) of the Action Plan for WA's 10-year Science and Technology Plan.

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# 227

Mon, Dec 8, 2025, 04:06 PM Australian Eastern Daylight Time  
[ID: sbm399272f4ecccc1fa4219d]

Title  
Prof

First Name  
Wojtek

Last Name  
Tomaszewski

Organisation  
Social Science Research Infrastructure Network

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Significant groundwork is already underway within existing NCRIS investments, and this should be recognised and consolidated rather than duplicated. A pertinent example is the Social Science Research Infrastructure Network (SSRIN), led by the University of Queensland with co-investment from ARDC, ABS, Monash University, ANU and UWA. SSRIN includes a dedicated activity stream focused on developing Indigenous Data Guidelines for the use of government administrative data. This work aligns closely with the Australian Government's Framework for Governance of Indigenous Data and provides a practical foundation on which future NRI investments can build.

Historically, Indigenous peoples have had limited trust in data collections, largely because data have too often produced little tangible benefit for communities and, in some cases, direct harm through misrepresentation or deficit framing. At the same time, many researchers working with large-scale administrative and longitudinal datasets lack clear, authoritative guidance on the appropriate use, analysis and reporting of Indigenous-identified data. The absence of a widely accepted social licence for the use of such data creates ethical uncertainty, undermines research quality, and risks perpetuating tensions between research institutions and Indigenous communities.

SSRIN is addressing this gap by co-developing validated, accessible protocols for analysing and reporting Indigenous-identified data in administrative datasets. The intention is not only to minimise the risk of inappropriate or potentially harmful use, but also to materially increase the likelihood that Indigenous peoples and communities benefit from research based on government data. Over the longer term, this approach supports a vision in which Australia is internationally recognised for ethical, inclusive and high-quality use of integrated data, grounded in Indigenous data sovereignty and self-determination.

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Looking forward, the NRI Roadmap could explicitly embed these principles across all future investments. In practical terms, this could include making future NRI funding - where applicable - conditional on demonstrable, in-built commitments by infrastructure designers, operators and custodians to adhere to Indigenous data governance guidelines that are endorsed by nationally representative Indigenous bodies. This shift would move cultural protocols and benefit sharing from being aspirational to being operational.

Achieving this requires a staged but decisive program of work:

- Within two years: establish, recognise or formally legitimise a nationally representative Indigenous body (or bodies) with oversight of Indigenous data governance in research infrastructure.
- Ongoing: develop, refine and test Indigenous data guidelines and protocols across disciplinary domains, including social sciences, health, environmental and linked administrative data.
- Within two years, then ongoing: translate validated guidelines into enforceable funding conditions and contract management mechanisms for relevant NRI investments.
- Ongoing: develop and regularly update training programs for researchers, data custodians and infrastructure staff.
- Within two years: build national institutional capacity for Indigenous data governance training, potentially through a dedicated institute responsible for setting standards in content and delivery.

Taken together, these actions would ensure that future NRI investments respect cultural protocols, support Indigenous self-determination, and deliver genuine benefit sharing, while also improving the quality, legitimacy and impact of Australia's data-enabled research.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An appropriate balance between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons and capability uplift across existing discipline- and theme-oriented NRI cannot be achieved by privileging one approach over the other. Both are necessary, and they address different, and complementary, needs within the national research infrastructure ecosystem.

First, Indigenous knowledges, data and perspectives intersect with virtually all domains of research supported through NRI: environment and climate, land and water management, biodiversity and ecology, health and biomedical research, language and culture, education, labour markets and social policy. This reality argues strongly for distributed capability. Without meaningful uplift across existing discipline- and theme-based infrastructures, Indigenous data governance risks becoming marginalised or treated as an optional "add-on", rather than embedded as a core element of high-quality research practice.

Second, Indigenous priorities also require independent, purpose-built infrastructure that serves Aboriginal and Torres Strait Islander interests first and foremost. A dedicated Research Data Commons capability would provide an institutional locus for Indigenous leadership, governance and decision-making, consistent with the principles of data sovereignty and self-determination. Without such a capability, responsibility for

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Indigenous data risks being diluted across multiple infrastructures where it may lack authority, continuity or cultural legitimacy.

At the same time, siloeing Indigenous research entirely within a separate infrastructure can unintentionally reproduce the very problems it seeks to address: separation from mainstream data assets, limited influence over how Indigenous data are used elsewhere, and reduced visibility in national research agendas. Conversely, relying solely on discipline-based uplift risks reducing Indigenous data governance to a compliance exercise, rather than a substantive shift in how data are governed, analysed and shared.

A balanced and pragmatic solution can be achieved by a hybrid model. A central, dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons should be established with genuinely multidisciplinary capability, e.g. not confined to the humanities or cultural data alone. It must be equipped to engage across areas such as biodiversity and ecology, land and water management, Indigenous health and medical data, and social science administrative and longitudinal data. This central capability would provide core cultural authority, governance, methodological leadership and oversight.

Critically, it would also function as a coordinating and enabling hub, working in structured partnership with existing NRI and NCRIS facilities. Discipline- and theme-based infrastructures would retain responsibility for domain-specific data assets and technical expertise, but their capability uplift would be guided and supported by the central Indigenous-led capability. In this way, Indigenous data governance becomes both embedded across the system and anchored in a dedicated, authoritative centre, and therefore achieving balance without fragmentation.

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# 226

Mon, Dec 8, 2025, 04:06 PM Australian Eastern Daylight Time  
[ID: sbm399272e09ee1968fa05e4]

Title  
Prof

First Name  
Richard

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McDermid

Organisation  
Astronomical Society of Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Aboriginal and Torres Strait Islander peoples are Australia's first astronomers, and as such, hold a unique and valued body of knowledge and knowledge systems for research. Astronomy NRI investments intersect with this knowledge in multiple ways, for example in the form of night-sky observational information, or in development of physical infrastructure such as observatory facilities. Each context requires its own approach.

For example, the Square Kilometre Array Observatory (SKAO) in Western Australia is enabled via an Indigenous Land Use Agreement (ILUA) between the Wajarri Yamaji people, CSIRO, and the Australian and Western Australian governments. This agreement enabled the construction of the SKA-Low telescope at the CSIRO Murchison Radio-astronomy Observatory, now known as Inyarrimanha Ilgari Bundara ("sharing the sky and stars"). This agreement ensures the telescope is built in a way that co-exists with culturally significant sites, and provides sustainable benefits like training, education, and enterprise opportunities for the Wajarri community.

In terms of Indigenous data systems specifically, this area is not well developed within the national astronomy digital research infrastructure portfolio. Astronomy is already a leader in principles underpinning the Australian Government's Framework for Governance of Indigenous Data, such as FAIR (Findable, Accessible, Interoperable, and Reusable) and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics), and is therefore well-placed to implement and follow the Framework.

In terms of 'what should be done', as per the Framework this would begin by partnering with Aboriginal and Torres Strait Islander people to understand what needs exist, and maintain that partnership at all stages of the data lifecycle to ensure their priorities are

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reflected in data about their communities. Establishing such partnerships requires appropriate resourcing and planning with full consultation of the Indigenous communities involved, in a way that brings this input directly and authentically in to the NRI investment strategy.

In terms of timeframe, this should be driven by the requirements of the process and the needs of the stakeholders involved. We would encourage any NRI investments in this area, however, to take a long-term and sustainable view.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

There are pros and cons to both approaches, and we would encourage the exploration of both Aboriginal and Torres Strait Islander Peoples Research Data Commons capabilities, and provision of uplift in capability across relevant discipline and theme-oriented NRI. Each approach can inform the other, as there will be value in discipline- and theme-led approaches (for example, leveraging and broadening existing related discipline capabilities), as well as multi-disciplinary learnings via the Data Commons approach. The balance should be driven by need, and the outcome of consultation and partnership.

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# 224

Mon, Dec 8, 2025, 04:00 PM Australian Eastern Daylight Time  
[ID: sbm399137434dccd866a3d5c]

Title  
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First Name  
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Organisation  
Australian Bureau of Statistics

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Ensuring that research and development undertaken using NRI is culturally appropriate through cultural review. This is most important for international research bodies seeking access to NRI without a demonstrated understanding of Aboriginal and Torres Strait Islander peoples' history and the Australian context.

For researchers using the ABS DataLab, this process involves referral of a project proposal to the ABS Cultural Review Panel for consideration. The cultural review process includes an assessment of each project within a matrix against the following criteria: the project must clearly address why Indigenous data are necessary to answer the research question(s), consider how research outcomes may affect the Indigenous community, and demonstrate sufficient input from relevant Indigenous communities or people to confirm alignment with Indigenous research priorities. Consideration of an ethics review by an Aboriginal and Torres Strait Islander Human Research Ethics Committee (HREC) should also be discussed.

The ABS is actively engaged in the implementation of the Australian Public Service (APS) Governance of Indigenous Data (the GID) Framework, whose vision is for Aboriginal and Torres Strait Islander peoples to have greater agency over how their data are governed within the APS, so that their priorities and aspirations are reflected.

As the GID framework is further embedded within operations, the cultural review process will continue to evolve, with scope for wider review and consultation to be included.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

The ABS co-chairs the Data Policy Partnership (DPP) established under the National Agreement on Closing the Gap. The DPP is looking at this issue in collaboration with Aboriginal and Torres Strait Islander peoples, state and territory representatives.

ABS also suggests educating researchers as a standard part of HDR induction to be aware of Aboriginal and Torres Strait Islander issues and how to undertake culturally appropriate research in Australia.

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# 223

Mon, Dec 8, 2025, 03:30 PM Australian Eastern Daylight Time  
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Title  
Prof

First Name  
Janeen

Last Name  
Baxter

Organisation  
ARC Centre of Excellence for Children and Families over the Life Course

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

It is essential that appropriate procedures and policies are followed in relation to the governance of Indigenous data. This includes Indigenous data sovereignty (the inherent rights of Indigenous people to maintain, control, protect and develop their data), CARE principles and adherence to Indigenous cultural and intellectual property rights.

Some of this is already being done under existing NCRIS investments. For example, the Social Science Research Infrastructure Network (SSRIN) (<https://ardc.edu.au/project/social-science-research-infrastructure-network/>), a new project led by The University of Queensland (UQ), with co-investment from Australian Research Data Commons (ARDC), Australian Bureau of Statistics (ABS), Monash University, The Australian National University (ANU) and The University of Western Australia (UWA) includes an Activity Stream on developing Indigenous Data Guidelines in the context of government administrative data.

Historically, Indigenous peoples have had limited trust in public data collections due to the minimal benefits from these collections, and often the experience of harm, from data collecting, analysing, and reporting. Furthermore, researchers lack guidance on appropriate use of Indigenous-identified data in administrative datasets. Collecting and using Indigenous-identified data lacks (Indigenous) social license undermining ethically responsible research, creating uncertainties in research processes and tensions with Indigenous communities.

SSRIN is developing validated and accessible protocols for analysing and reporting Indigenous-identified data are developed that increase the likelihood that Indigenous people and communities benefit from government administrative data research, while

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minimising the risk of inappropriate use. This aims to contribute to a long-term vision where Australia leads in ethical and inclusive data use, ensuring Indigenous peoples and communities directly benefit from how administrative data are analysed and reported.

In addition to implementing these principles for already-collected and available data, it is important to assess the needs of future data collections and where possible to involve Indigenous leaders in collaboration and co-design at the earliest stages to ensure future accountability and capacity-building.

By the next funding round, every NRI capability from Astrology Australia through to Therapeutic Innovation Australia should publish a statement acknowledging the significance of Indigenous heritages and knowledges to life in Australia, and that these will be respected, consulted, and referenced where appropriate in the course of conducting NRI business.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A centralised approach appears more efficient. It would need to be multidisciplinary however, going beyond humanities to support existing NRI capabilities in areas like biodiversity, ecology, land/water management, health/medical data and social science administrative data, which all go beyond humanities. A central capability with sufficient multi-disciplinary expertise would be a good option to provide core cultural capacity and oversight, and yet also be able to liaise with the multiple area-specific NRI/NCRIS facilities with all their disciplinary diversity.

Perhaps if every NRI capability had at least one Indigenous representative as part of their governance structure, such as on their Board, then those same Indigenous persons could collectively form the governance structure of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, thereby providing a tangible two-way link between a new, dedicated Indigenous research capability and all other NRI capabilities.

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# 219

Mon, Dec 8, 2025, 03:11 PM Australian Eastern Daylight Time  
[ID: sbm399240c2b2e106923210d]

Title  
Prof

First Name  
Christopher

Last Name  
Armstrong

Organisation  
University of New England

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

**Addressing the Close the Gap Imperative Through Research Infrastructure Transformation**  
The persistent failure to Close the Gap is not a data problem—it is a rights problem and a governance problem. For Australia's National Research Infrastructure to meaningfully contribute to Indigenous thriving, we must shift from extractive research paradigms to Indigenous Rights-Based Approaches (IRBA) that operationalize self-determination, sovereignty, and reciprocity within the research ecosystem itself.

**Core Principles for NRI Engagement with Indigenous Knowledge Systems:**

1. **Rights, Not Needs:** Research infrastructure investments must recognise Indigenous Peoples' inherent rights to their knowledge, data, and cultural expressions as articulated in UNDRIP, rather than positioning Indigenous communities as passive beneficiaries of infrastructure "access."
2. **Accountability, Not Awareness:** NRI must embed structural accountability mechanisms including:
  - a. Indigenous-led governance across all relevant infrastructure (not advisory roles)
  - b. Mandatory Free, Prior and Informed Consent (FPIC) protocols for all research involving Indigenous data, knowledge, or communities
  - c. Indigenous Data Sovereignty operationalized through CARE principles (Collective Benefit, Authority to Control, Responsibility, Ethics) alongside FAIR principles
3. **Community-defined success metrics** that measure institutional accountability, not just research outputs
4. **Shared Institutional Responsibility:** The burden of engagement cannot rest on Indigenous communities or scholars. NRI transformation requires whole-of-system commitment with:
  - a. Dedicated, sustained multi-year funding for Indigenous-led infrastructure governance

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- b. Portfolio-specific capacity building for non-Indigenous researchers in IRBA methodologies
- c. Integration of Indigenous knowledge systems across all NRI domains, not siloed as separate infrastructure
- 5. Epistemic Justice: Research infrastructure must support epistemic pluralism that elevates Indigenous knowledge systems as foundational, not supplementary, science:
  - a. Recognition of Indigenous Peoples as First Knowers and Scientists
  - b. Infrastructure designed with rather than for Indigenous communities
  - c. Protection against epistemic violence through culturally-responsive ethics frameworks
- 6. Reciprocity and Benefit-Sharing: NRI must ensure:
  - a. Community benefit is central to research design, not an afterthought
  - b. Research outcomes directly address community-identified priorities aligned with Close the Gap targets
  - c. Long-term relational partnerships grounded in mutual accountability, not transactional engagement

**Why This Matters for Close the Gap:**

Close the Gap targets fail when research infrastructure perpetuates colonial patterns of knowledge extraction, deficit narratives, and Indigenous exclusion from decision-making. Rights-based research infrastructure creates the conditions for:

- Community-controlled evidence that informs policy responsive to Indigenous-defined needs
- Culturally safe data ecosystems that enable longitudinal research while protecting sovereignty
- Indigenous research leadership that builds capacity within communities, not just within institutions
- Systemic accountability that addresses root causes of inequity, not symptoms

The 2026 NRI Roadmap must recognize that infrastructure is never neutral. It either perpetuates colonial research practices or actively dismantles them. A rights-based approach ensures NRI becomes a tool for Indigenous self-determination and institutional transformation, making infrastructure directly accountable to the communities whose knowledge it seeks to support and whose futures depend on genuine systemic change.

**Recommended Immediate Actions (2026-2027):**

- Establish Indigenous Governance Boards with decision-making authority (not advisory) across all NRI providers engaging with Indigenous knowledge systems
- Mandate FPIC protocols and IRBA training for all researchers accessing NRI capabilities involving Indigenous data or communities
- Allocate minimum 5% of NRI investment to Indigenous-led infrastructure with Indigenous governance
- Develop accountability frameworks with community-defined indicators reported annually to Indigenous communities and governance bodies
- Commission Indigenous-led evaluations of existing NRI to identify barriers and opportunities for rights-based transformation

This positions NRI as critical infrastructure for justice, not just research—and frames Close the Gap as a systemic accountability challenge that research infrastructure must help address through fundamental transformation of power, governance, and knowledge production.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

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Recommended Immediate Actions (2026-2027):

- Establish Indigenous Governance Boards with decision-making authority (not advisory) across all NRI providers engaging with Indigenous knowledge systems
- Mandate FPIC protocols and IRBA training for all researchers accessing NRI capabilities involving Indigenous data or communities
- Allocate minimum 5% of NRI investment to Indigenous-led infrastructure with Indigenous governance
- Develop accountability frameworks with community-defined indicators reported annually to Indigenous communities and governance bodies
- Commission Indigenous-led evaluations of existing NRI to identify barriers and opportunities for rights-based transformation

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**# 217**

Mon, Dec 8, 2025, 02:54 PM Australian Eastern Daylight Time  
[ID: sbm3991171cf5e581238031a]

Title  
A/Prof

First Name  
Christopher

Last Name  
Marquis

Organisation  
University of NSW

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
I don't feel qualified to meaningfully answer this question

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
I don't feel qualified to meaningfully answer this question

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# 215

Mon, Dec 8, 2025, 02:48 PM Australian Eastern Daylight Time  
[ID: sbm398fca2558f052661b15a]

Title  
Prof

First Name  
Marcia

Last Name  
Langton

Organisation  
The University of Melbourne

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

The recognition of the existence of Aboriginal and Torres Strait Islander knowledge systems as a priority area in Australian research is a welcome broadening of the understanding of knowledge and Australian society. These knowledge systems exist in their own right and are accessible to researchers who study and research them, interpret and translate them from their original languages into research outputs, and derive key insights into their nature and content. The corpus of knowledge produced across many disciplines that incorporates Indigenous knowledge has grown with the recognition of the role of Indigenous knowledge holders and the value of their Indigenous knowledge in a range of fields. This research is often multidisciplinary and interdisciplinary and requires additional research skills, including learning one or more Australian languages, becoming familiar with local Indigenous social structures and formations, such as kinship and descent-based groups and institutions, learning about their understanding of environments from an insider point of view, and by conducting collaborative research through partnerships with Indigenous people and entities, contributing to human knowledge across many disciplines by including rigorous research data derived from Indigenous knowledge holders. Researchers in these disciplines are likely to encounter Indigenous people and Indigenous knowledge systems throughout their careers. The lessons learnt from collaborative research with Indigenous people should be part of the training of all researchers. Such training would enable them to implement research methods, methodologies, and approaches conducive to a respectful, rights-based approach, research outputs that do not exclude Indigenous considerations, and improved research outputs, including publications that recognise Indigenous inputs. There is a better understanding of key concepts such as self-determination, cultural protocols, and benefit-sharing, driven by research partnerships with Indigenous people and rigorous research into their Indigenous knowledge systems. This has also led to improved ethical guidelines and ethical practice, not only in relation

to Indigenous people, but also in relation to research subjects in general, and especially historically excluded groups. The expectations of Indigenous people in relation to data about them, or which they generate, is that - at a minimum - it should be accurate, and that it be shared with them in accordance with Priority 4 of the National Closing the Gap Strategy, and especially at a regional level. The principle of self-determination is fundamental to the way forward in future NRI investments. Priority 4 is the basic, minimal expectation, but its implementation should lead to better outcomes for Indigenous Australians. Observing cultural protocols to protect the cultural safety of Indigenous Australians in data systems is necessary to ensure high standards of human rights, data quality, and data governance. Expediency in observing cultural protocols will undermine the intentions of the NRI in its recognition of Indigenous knowledge and Indigenous values. As the Director of the Indigenous Studies Unit in Onemda in the School of Population and Global Health at The University of Melbourne, I am the lead researcher in the Indigenous Data Network and its projects, including the ARDC-funded Improving Indigenous Research Capabilities. Our team and network members have developed Indigenous data catalogues, dictionaries, geospatial infrastructure, and metadata tools to enable the inclusion of relevant Indigenous knowledge in data storage, data sharing, and data governance. Respecting cultural protocols and embedding self-determination within national research infrastructure requires systemic transformation rather than incremental technical fixes. Indigenous Data Governance (IDG) provides the conceptual foundation for this shift, positioning cultural integrity as a condition of research excellence and embedding authority and accountability across the data lifecycle.

The Roadmap should commit to establishing a nationally distributed, Indigenous-led capability that integrates governance frameworks, technical platforms, and collaborative mechanisms. Foundational work should commence immediately and be substantially advanced within the early implementation period, creating the conditions for cultural governance to operate as a norm rather than an aspiration. This capability needs to address interdependencies across health and wellbeing, education and employment, galleries, libraries, archives and museums, and Indigenous data infrastructure and data science. Governance structures must institutionalise consent, benefit-sharing, and authority to control, supported by ethics frameworks co-designed with Indigenous organisations and embedded across all NRI capabilities engaging with Indigenous data. Technical architecture should adopt a distributed model applying FAIR and CARE principles, supported by metadata standards tailored to Indigenous knowledge systems. Interoperability must be achieved without compromising cultural governance, enabling integration with existing NRI while maintaining Indigenous authority over data. Cybersecurity and Trust & Identity solutions require equal attention, creating secure environments for sensitive data and adaptive protocols that respect cultural protocols. These measures would underpin ethical data sharing and controlled access across domains. Investment in advanced analytics and AI tools developed under Indigenous ethical frameworks is essential. These tools should support language technologies, provenance tracking, and culturally governed algorithmic processes, embedding cultural protocols into automation and ensuring technological innovation reinforces Indigenous authority and self-determination. Workforce development must be prioritised from the outset: comprehensive training programs for Indigenous communities, researchers, and technical staff, alongside tailored programs for non-Indigenous researchers, would build the expertise required to sustain these systems. Mentorship, fellowships, and leadership pathways should be embedded early to secure Indigenous representation at every level of infrastructure governance and implementation.

Strategic partnerships with international research organisations would position Australia as a global leader in ethical AI and culturally governed data science, enabling knowledge exchange and best practice development. Embedding IDG within the architecture of

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national research infrastructure would move cultural protocols and benefit-sharing from the margins to the centre of research practice, aligning with the Roadmap's emphasis on interoperability, distributed design, and ethical governance. This strategic approach would transform aspiration into architecture, creating a research ecosystem that is technologically sophisticated, culturally grounded, and responsive to societal imperatives. This approach directly addresses the Australian Government's Framework for the Governance of Indigenous data:

Consent and Authority to Control → Embedded in the recommendation for governance structures that institutionalise consent and Indigenous authority across the data lifecycle.  
Benefit Sharing → Highlighted as a principle within governance and ethics frameworks co-designed with Indigenous organisations.

Cultural Protocols and Governance as Norms → Emphasised through the call for cultural governance to be operational rather than aspirational.

Secure Environments and Adaptive Protocols → Linked to the framework's requirement for safeguarding sensitive data and respecting cultural protocols.

Capacity Building and Indigenous Leadership → Addressed through workforce development, mentorship, and leadership pathways.

In our earlier submission to the 2026 NRI Roadmap Survey, we detailed the requirements for implementing the national research priority, Aboriginal and Torres Strait Islander knowledge systems in the NRI ecosystem. At Q. 32 in that submission, we pointed to the urgent need for support, resources and a new NRI capability, to enable this.

'Proposed infrastructure capability: Aboriginal and Torres Strait Islander Research Data Commons (ATSIRDC) Indigenous research data is located across all academic disciplines, including health and medicine, environmental science and ecology, social sciences, law and policy, arts and humanities, education and technology and innovation. Given its breadth, it is inherently interdisciplinary and intersects with all research communities across Australia.

A new National Research Infrastructure (NRI) capability focusing on scaling up the Indigenous Data Network's ARDC HASS&I 'Improving Indigenous Research Capabilities (IIRC)' project is critical for recognising, securely storing and effectively and appropriately utilising the wealth of Aboriginal and Torres Strait Distinguished Professor Marcia Langton, a Torres Strait Islander data for research, policy-making, and cultural preservation. Led by a descendant of the Yiman and Bidjara nations, The IIRC project is a critical initiative aiming to build the capacity of Indigenous research data communities by developing and improving access to secure, culturally appropriate data management tools and platforms that enable more effective management, sharing and protection of Indigenous data in alignment with Indigenous data governance principles. The project has made significant advances to foster collaboration between Indigenous communities, researchers and other Indigenous data custodians, providing essential training, resources, and tools to strengthen Indigenous participation in research. Despite its achievements, the IIRC project lacks the scale and investment required to address the extensive needs of Indigenous data communities across Australia. To support Indigenous data governance, protect cultural heritage, and integrate Indigenous knowledge into research, significant investment in long-term research infrastructure is required. This includes dedicated resources for managing, protecting, and sharing Indigenous data to facilitate large-scale research, policy development, and community-driven initiatives. Such investment is essential to meet growing demands for digital infrastructure, data security, cultural protocols, and supporting Aboriginal and Torres Strait Islander communities to maintain control over their knowledge. To appropriately scale the IIRC project to a new NRI capability would require four years, enabling collaboration across disciplines and Indigenous data communities,

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testing and iterative development. This timeframe would support the development and implementation of a data commons that is robust, secure and capable of embedding Indigenous data governance whilst promoting Aboriginal and Torres Strait Islander self-determination and cultural integrity. Professor Langton and the Indigenous Data Network would be pleased to elaborate on our survey responses and offer further advice to the Department of Education.'

Further, in response to Q. 35 in that submission, we presciently identified the issues for creating the conditions for the success of a new NRI capability, including building Indigenous leadership across the relevant disciplines.

'Proposed infrastructure capability: Aboriginal and Torres Strait Islander Research Data Commons (ATSIRDC) Indigenous research data is located across all academic disciplines, including health and medicine, environmental science and ecology, social sciences, law and policy, arts and humanities, education and technology and innovation. Given its breadth, it is inherently interdisciplinary and intersects with all research communities across Australia.

A new National Research Infrastructure (NRI) capability focusing on scaling up the Indigenous Data Network's ARDC HASS&I 'Improving Indigenous Research Capabilities (IIRC)' project is critical for recognising, securely storing and effectively and appropriately utilising the wealth of Aboriginal and Torres Strait Islander data for research, policy-making, and cultural preservation. Led by Distinguished Professor Marcia Langton, a descendant of the Yiman and Bidjara nations, The IIRC project is a critical initiative aiming to build the capacity of Indigenous research data communities by developing and improving access to secure, culturally appropriate data management tools and platforms that enable more effective management, sharing and protection of Indigenous data in alignment with Indigenous data governance principles. The project has made significant advances to foster collaboration between Indigenous communities, researchers and other Indigenous data custodians, providing essential training, resources, and tools to strengthen Indigenous participation in research. Despite its achievements, the IIRC project lacks the scale and investment required to address the extensive needs of Indigenous data communities across Australia. To support Indigenous data governance, protect cultural heritage, and integrate Indigenous knowledge into research, significant investment in long-term research infrastructure is required. This includes dedicated resources for managing, protecting, and sharing Indigenous data to facilitate large-scale research, policy development, and community-driven initiatives. Such investment is essential to meet growing demands for digital infrastructure, data security, cultural protocols, and supporting Aboriginal and Torres Strait Islander communities to maintain control over their knowledge. To appropriately scale the IIRC project to a new NRI capability would require four years, enabling collaboration across disciplines and Indigenous data communities, testing and iterative development. This timeframe would support the development and implementation of a data commons that is robust, secure and capable of embedding Indigenous data governance whilst promoting Aboriginal and Torres Strait Islander self-determination and cultural integrity. Professor Langton and the Indigenous Data Network would be pleased to elaborate on our survey responses and offer further advice to the Department of Education.'

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Aboriginal and Torres Strait Islander Research Data Commons

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The most critical new capability for inclusion in the 2026 NRI Roadmap is the establishment of an Indigenous Research Data Commons. Indigenous research data spans health, environment, social sciences, law, policy, cultural heritage, and technology, making it characteristically interdisciplinary and central to national priorities. This capability would provide secure, culturally governed infrastructure for managing, sharing, and protecting Indigenous data at scale, embedding Indigenous Data Governance principles and supporting self-determination. It would enable compliance with cultural protocols, deliver interoperable platforms and decentralised data centres, and integrate advanced tools for AI, language processing, and provenance tracking. These functions are necessary for ethical research, policy development, and cultural preservation, and cannot be achieved through existing infrastructure. Investment in this capability would transform Australia's research ecosystem by creating a foundation for inclusive, culturally grounded innovation and positioning Australia as a global leader in ethical AI and data governance. Achieving balance between a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability and systemic uplift across discipline-oriented NRI should be conceived as integrated and mutually reinforcing, not as competing priorities. The dedicated capability should provide the governance architecture, technical foundations, and cultural authority necessary to embed Indigenous Data Governance (IDG) within national research infrastructure. Without this anchor, efforts to integrate IDG and Indigenous knowledges would remain fragmented and symbolic.

The capability should be designed to deliver both objectives: establishing governance frameworks, interoperable platforms, and collaborative mechanisms while enabling connectivity with existing NRI. Its design should prioritise metadata standards aligned with the FAIR and CARE principles, secure environments supported by Indigenous-led Trust & Identity protocols, and adaptive cybersecurity measures that respect cultural protocols. Technical components would support advanced analytics and AI tools developed within Indigenous governance and ethical frameworks, embedding cultural protocols into algorithmic design and provenance tracking. These features would allow the capability to serve as a foundation for systemic uplift across health, education, cultural heritage, data science and other research domains.

Systemic uplift requires embedding these standards and practices across all NRI capabilities that engage with Indigenous data. This would involve co-designed ethics frameworks, shared governance models, and mechanisms for interoperability that avoid duplication and promote alignment. Incentives for collaboration—such as shared technical resources, and governance dashboards—would encourage NRI providers to adopt Indigenous governance protocols as part of their operational norms. Workforce development must remain central to both streams: comprehensive training programs for Indigenous communities and researchers, alongside tailored programs for non-Indigenous researchers, would build the expertise required to sustain these systems and foster cross-domain collaboration.

This dual approach would create an integrated ecosystem rather than isolated initiatives. A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability should provide the conceptual and technical infrastructure for Indigenous governance while driving systemic uplift through its distributed design. Together, these measures would position Australia to lead globally in ethical AI, culturally governed data science, and inclusive research infrastructure. By embedding Indigenous governance within both specialised and general NRI capabilities, the Roadmap would deliver a research system that is technologically advanced, culturally grounded, and responsive to national priorities.

What are the critical skills that the NRI workforce should have regardless of their technical expertise?

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Building a future-ready NRI workforce requires capabilities that extend beyond technical proficiency to encompass cultural, ethical, and collaborative competencies. All staff should understand Indigenous Data Governance principles and the Australian Government's Framework for Governance of Indigenous Data, including consent, benefit-sharing, and cultural protocols, to enable respectful and accountable engagement with Indigenous data. The ability to apply ethics frameworks in complex, cross-sector environments is critical, particularly when working with sensitive or community-controlled data. Skills in co-design and participatory governance are essential for genuine collaboration with Indigenous organisations and communities, embedding Indigenous authority and building trust. Even non-technical staff need literacy in FAIR and CARE principles, metadata standards, and the implications of interoperability for cultural governance, supporting informed decision-making and alignment with best practice. Communication skills that translate complex technical and governance concepts into accessible language for diverse audiences underpin transparency and accountability. Adaptive leadership and systems thinking are vital for anticipating emerging challenges such as AI ethics or cybersecurity and adjusting governance and operational models accordingly. Finally, a commitment to capacity building is fundamental, including mentoring and supporting Indigenous participation at all levels of infrastructure governance and implementation, and fostering pathways for Indigenous leadership and technical expertise. Embedding these capabilities across the NRI workforce would create a research ecosystem that is technologically advanced, culturally grounded, and ethically robust, aligning with the Roadmap's vision of interoperability, distributed design, and inclusive governance.

What is the best approach to retain staff and add to new capabilities to the current NRI workforce?

Retention and capability-building within the NRI workforce require a strategy that combines stability, professional development, and cultural governance. Competitive remuneration and secure career pathways are necessary but insufficient on their own. The workforce must be engaged in meaningful roles that align with national priorities and provide opportunities for leadership, innovation, and collaboration across domains. Embedding Indigenous governance and cultural protocols into infrastructure design creates a distinctive value proposition for staff retention. When workforce members participate in co-design processes and governance structures, they gain a sense of purpose and accountability that extends beyond technical delivery. This approach fosters long-term commitment and positions NRI roles as central to ethical and inclusive research practice. Adding new capabilities requires investment in training and mentorship programs that build expertise in Indigenous Data Governance, ethics, and culturally governed data science. These programs should be complemented by leadership pathways for Aboriginal and Torres Strait Islander professionals, ensuring representation at all levels of infrastructure governance and implementation. Cross-disciplinary training for non-Indigenous staff is equally important, equipping them to work ethically and collaboratively in culturally complex environments.

A dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability would provide the structural foundation for these workforce strategies. By integrating governance frameworks, technical platforms, and collaborative mechanisms, this capability can deliver distributed training programs, mentorship networks, and leadership development initiatives. It would also create opportunities for staff to work on advanced analytics, AI tools, and interoperability solutions developed under Indigenous ethical frameworks, offering cutting-edge technical challenges alongside cultural governance responsibilities. This combination of technical innovation and cultural integrity strengthens retention and attracts talent committed to shaping a research ecosystem that is technologically sophisticated, culturally grounded, and globally relevant.

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# 214

Mon, Dec 8, 2025, 02:38 PM Australian Eastern Daylight Time  
[ID: sbm399222e7fce577fa5e340]

Title  
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Rothacker

Organisation  
ACU

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

- Embed Indigenous governance and CARE principles across all NRI investments.
- Co-design infrastructure and capability with Aboriginal and Torres Strait Islander communities.
- Integrate cultural awareness and data sovereignty training into NRI workforce development.
- Establish formal partnerships with First Nations organisations.
- Timeframe: Immediate action with multi-year investment.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

**Dedicated Capability:** Invest in a flagship Aboriginal and Torres Strait Islander Peoples Research Data Commons to provide culturally safe, sovereign data infrastructure that embeds CARE principles and supports Indigenous-led research.

**Cross-NRI Uplift:** Require all relevant NRI facilities to integrate Indigenous data governance protocols and cultural competency training, ensuring that Indigenous knowledge systems are embedded across disciplines rather than siloed.

Ensure the dedicated Data Commons is interoperable with other NRI platforms to enable interdisciplinary research while maintaining sovereignty and cultural protocols.

Develop shared metadata standards and identifiers to improve discoverability and linkage across systems.

Support mechanisms for knowledge exchange between Indigenous researchers and other disciplines to foster integration without compromising cultural integrity.

Create pathways for Indigenous researchers and data specialists to participate in both the dedicated Data Commons and broader NRI facilities.

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# 212

Mon, Dec 8, 2025, 02:26 PM Australian Eastern Daylight Time  
[ID: sbm3991b0a4cbe5f9b022797]

Title  
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First Name  
Heath

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Organisation  
Australian Access Federation

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

For researchers, system-wide Trust and Identity (T&I) is required to support the principles of FAIR (Findable, Accessible, Interoperable, and Reusable) to enable the sharing and reuse of data, and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics) for the ethical reuse of data.

Without system-wide adoption of core standards and technologies for T&I solutions, FAIR is impossible to deliver. 'Findable' relies on the use of persistent identifiers (PIDs) and 'Accessible' and 'Interoperable' requires mature T&I to implement appropriate access controls. CARE requires mature T&I mechanisms to support the implementation of 'Authority to control', which enables the custodian to control their data through electronic means.

Delivering contemporary, fit-for-purpose T&I infrastructure and policy that makes it easier for NCRIS capabilities to deliver FAIR and CARE principles requires investment. Current T&I capability innovation is exploring this through specific co-designed projects with the AAF and NRI co-partners, however, additional investment is needed to meet bespoke, culturally aligned, and advanced requirements that go beyond the capabilities of existing secure, certified systems.

Schedules and timeframes must be informed by and be respectful of the Indigenous communities involved, not pre-determined in the absence of community consultation.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Prototyping, incubation and flagship programs need to be undertaken with the community and stakeholders, to co-design new technologies and processes, specific to research domains and ensure that they are fit for purpose for the Australian context.

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Policy, architecture and engineering work with concerted community engagement is needed to augment existing Trust and Identity (T&I) solutions and to simplify and extend mechanisms to make it easier for the NCRIS community to follow and apply FAIR and CARE principles. This will contribute to national efforts to lift cultural capability and competency, including cultural safety and respect for domain knowledge across the sector and must be informed by and be respectful of the Indigenous communities involved.

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# 210

Mon, Dec 8, 2025, 02:19 PM Australian Eastern Daylight Time  
[ID: sbm3992119adee1d90ac0ea1]

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AURIN

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We acknowledge that future NRI investment must respect cultural protocols, support Indigenous self-determination, enable benefit sharing, and align with the Australian Government's Indigenous Data Governance framework.

However, we also recognise that Indigenous knowledge systems (IKS) are diverse; Indigenous people are not a homogeneous group, and the NRI must be capable of managing multiple—and sometimes conflicting—definitions and perspectives. IKS are multi-dimensional systems that can't be reduced to data governance protocols. Thus, an important question remains: should an Australian leading entity addressing IKS be contained within the NRI framework?

The timeframe for embedding these outcomes is not within our expertise to comment on. Nonetheless, we trust it will, at least in part, be proportional to the resources available. This reinforces the value of delivering expertise across NRI groups/themes and not within independent facilities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Overall, AURIN supports a hybrid model that includes a relevant knowledge and capability uplift of existing NRIs, coordinated by dedicated resources. Whichever model is brought forward, there will be a deep need for trust-building, reciprocity, cultural competency uplift, and long-term commitment.

National investment in NRI with regard to IKS, should, first and foremost, be dedicated to enabling existing NRI to excel in the application of cultural protocols, to support self-determination and promote benefit sharing. Given the limited availability of specialised indigenous and NRI expertise, it makes sense to establish mechanisms to deliver these

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outcomes across groups/themes of NRI, rather than fund each facility to engage dedicated expertise.

NRI facilities with strong links with industry, such as AURIN, could also play a key role in advising and educating private sector on collecting, curating, storing and sharing data associated with IKS.

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# 205

Mon, Dec 8, 2025, 12:38 PM Australian Eastern Daylight Time  
[ID: sbm3990946b81f094c008450]

Title  
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Organisation  
Australian Museum Research Institute

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
The Australian Museum Research Institute (AMRI) strongly supports self-determination and benefit sharing. The First Nations Division of the Australian Museum is a leader in the establishment of robust cultural protocols developed in close partnership with communities. Possible actions to ensure future NRI investments respect cultural protocols include:  
Immediate actions (1-2 years):

- Require all NRI funding recipients to develop or demonstrate existing cultural protocols and Indigenous Data Sovereignty frameworks as a condition of investment
- Provide dedicated funding for institutions to undertake cultural protocol development work with communities

Medium-term actions (3-5 years):

- Build capacity within natural science collections institutions (in particular) for meaningful engagement with Indigenous knowledge systems
- Support digitisation initiatives that enable community access to collections while respecting cultural sensitivities

Long-term structural change:

- Ensure Indigenous representation in NRI governance structures
- Develop career pathways for Indigenous collection specialists and researchers

Note: We defer to our First Nations colleagues and communities to lead these conversations.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

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While we strongly support initiatives to elevate Aboriginal and Torres Strait Islander knowledge systems, we defer to our First Nations colleagues to determine the most appropriate model for a dedicated capability versus distributed uplift.

From the perspective of AMRI, we suggest that both approaches would have benefit:

A dedicated capability would:

- Provide authoritative guidance on protocols and standards across institutions
- Support and enable Indigenous control over data and knowledge
- Build specialised expertise in Indigenous data governance

Distributed uplift would:

- Embed cultural protocols within existing collections infrastructure
- Build capability across the full breadth of collections (natural science, cultural, archival)
- Enable institutions like AMRI to better serve community needs

Resources required for either approach: either model will require sustained operational funding for skilled personnel, not just capital investment. Cultural protocol development, community engagement, data sovereignty implementation, and ongoing relationship maintenance require dedicated staff with appropriate expertise and authority.

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# 199

Mon, Dec 8, 2025, 11:58 AM Australian Eastern Daylight Time  
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In what capacity are you responding?  
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Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

All new infrastructure should be built with Indigenous data sovereignty and Indigenous data governance at its foundations which will require thorough, and far-reaching consultation with Indigenous communities at all stages of the data collection, organisation, and dissemination process. This approach should also align with ICIP protocols which recognises Indigenous knowledge systems and Indigenous communities as knowledge holders.

All existing research infrastructure should be audited to identify what kind of reparative work needs to be undertaken to align it to the principles of Framework for Governance of Indigenous Data. Existing infrastructure should be given 2 years to demonstrate its alignment. Existing best practice examples should be identified, supported and their approaches widely disseminated.

NRI investments should also identify, for investment, those examples of best practice to ensure they are accessible to Indigenous communities.

The NRI needs to recognise that Aboriginal and Torres Strait Islander communities will have wide-ranging approaches to how their data has been collected and disseminated in the past, how it should be collected and disseminated now, and that a one-size-fits-all solution is not appropriate as a long-term approach. National facilities in particular will need to take into account this diversity of approaches and perspectives.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Aboriginal and Torres Strait Islander data will intersect with all NRI capabilities so uplift of capability, including with Aboriginal and Torres Strait Islander researchers and advisers,

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should similarly be across the breadth of the NRI, aligned with IDG and IDS principles and ICIP protocols.

Mechanisms for alignment across NRI providers is outlined above. Collaboration will happen if First Nations researchers are embedded within research infrastructure projects and the project has clear mechanisms for consultation with First Nations communities. Focusing exclusively on a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons risks sidelining First Nations involvement in projects that fall outside the Commons and risks the data commons becoming an inaccessible and difficult to navigate data swamp.

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# 196

Mon, Dec 8, 2025, 11:53 AM Australian Eastern Daylight Time  
[ID: sbm39918bfa4ae528bc83a06]

Title  
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In what capacity are you responding?  
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Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Immediate (2026-2027):

- Establish Indigenous-led governance structures for all NRI initiatives that will impact indigenous communities, including advisory boards and decision-making roles.
- Mandate co-design principles in funding agreements to ensure shared power and accountability between researchers and Aboriginal and Torres Strait Islander communities.
- Develop benefit-sharing agreements that guarantee tangible outcomes such as employment pathways, capacity-building programs, and intellectual property protections.

Medium Term (2028-2030):

- Embed cultural protocols in NRI standards for data collection, storage, and access.
- Implement training programs for NRI staff on cultural competency and Indigenous Data Governance principles.

Long Term (2030 onwards):

- Monitor and evaluate compliance through annual reporting and independent audits.
- Scale Indigenous-led research infrastructure to ensure sustainability and sovereignty.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Design Approach for Dedicated Capability:

- We agree with the proposal to establish a First Nations Research Data Commons, governed by Indigenous organisations, to ensure sovereignty over data and culturally safe digital platforms whilst maintaining access to data to indigenous communities. As mentioned in the issues paper the commons should be built around the principles of both FAIR (findable, accessible, interoperable, reusable) and CARE (collective benefit, authority to control, responsible, ethical).

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- Incorporate protocol-driven access controls and community-led decision-making for sensitive knowledge.

**Mechanisms for Alignment and Collaboration:**

- Introduce cross-NRI incentives for collaboration, including shared funding streams and joint governance arrangements.
- Develop interoperability standards to enable integration with discipline-specific infrastructures without compromising cultural protocols.
- Require alignment reporting in NRI investment agreements to demonstrate collaboration and shared outcomes.

**Balance Strategy:**

- Allocate and maintain baseline funding for cultural capability uplift across all NRI facilities (training, engagement frameworks).
- Complement this with targeted investment in the dedicated Commons to address unique needs and leadership by Aboriginal and Torres Strait Islander communities.

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# 192

Mon, Dec 8, 2025, 11:44 AM Australian Eastern Daylight Time  
[ID: sbm3991835109e1f22c2f818]

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The University of Sydney

In what capacity are you responding?  
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Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We see the implementation of the National Science and Research Priority (NSRP) 'Elevating Aboriginal and Torres Strait Islander Knowledges Systems' (announced on 2024) as an opportunity to shape Australia's research ecosystem so that this specific NSRP has long-term sustainability and impact. In this context, future NRI investments should embed cultural authority and Indigenous governance from the outset. Key actions include:

Immediate (0-2 years):

- Establish Indigenous advisory structures for all NRI capabilities.
- Adopt ethical protocols that respect cultural protocols and Indigenous Cultural and Intellectual Property (ICIP).
- Require cultural competence training for key NRI staff and users.
- Prioritise Indigenous-led research approaches.

Medium term (3-5 years):

- Implement Indigenous data sovereignty principles across all NRI data lifecycles.
- Embed co-design processes for new infrastructure and upgrades.
- Create dedicated spaces (physical and digital) for Indigenous collaboration and knowledge exchange.

Long term (5+ years):

- Achieve sustained representation of Aboriginal and Torres Strait Islander peoples in NRI governance and workforce.
- Ensure benefit-sharing mechanisms are standard practice across all NRI facilities.

These steps align with the Australian Government's Indigenous Data Governance Framework. Moreover, the rationale underpinning the above response is aligned with our University's One Sydney, Many People (OSMP) strategy. Fundamentally, we support a

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national approach that recognises Aboriginal and Torres Strait Islander knowledge systems as foundational to Australia’s research landscape. Recognition should be enacted through shared governance, co-designed policy, and practice standards that embed cultural authority and intellectual sovereignty across all NRI capabilities. This aligns with the Issues Paper’s focus on dedicated input regarding Aboriginal and Torres Strait Islander knowledge systems and the roadmap’s intent to shape long-term, nationwide planning.

**1) Shared governance and cultural authority**

Resource the inclusion of Indigenous advisory/steering structures in new and existing NRI facilities, ensuring Aboriginal and Torres Strait Islander representatives lead from concept through operation and evaluation. These structures should have decision-making authority proportionate to their responsibilities.

Embed local Custodians/Elders and Indigenous researchers in governance, respecting the diversity of Country and knowledge traditions relevant to facility locations and data holdings.

**2) Ethical frameworks, protocols and IP/knowledge rights**

Adopt and operationalise clear ethical protocols for research that involves Indigenous knowledges, including culturally appropriate consent, benefit-sharing, and acknowledgement. Policies must recognise Indigenous Cultural and Intellectual Property (ICIP), with pathways for community-controlled licensing and attribution.

Incorporate data stewardship principles consistent with Indigenous data sovereignty and culturally informed data governance in NRI repositories, platforms and workflows.

**3) Cultural competence and capability building**

Require appropriate levels of cultural competence training across key leaders of NRI facilities (leaders, technical staff, users), delivered with and by Indigenous experts. Our University’s long-standing programs (e.g. National Centre for Cultural Competence; One Sydney, Many People Strategy (OSMP) commitments to competence across education and research) demonstrate the feasibility and impact of such capability building.

Resource ongoing professional development and community engagement activities that are co-designed with Aboriginal and Torres Strait Islander communities and organisations.

**4) Recognition in physical and digital environments**

Consideration should be applied to implement the Walanga Wingara Mura Design Principles for key NRI sites—dual naming, bilingual signage, and culturally significant narratives—so that facilities reflect respect for Country and provide welcoming spaces for Indigenous collaborators and visitors.

In digital infrastructure (portals, catalogues, metadata), recognise Indigenous provenance, language, and cultural context, including appropriate content warnings and community-led curation. Consideration of the process by which this would be achieved is also key.

**5) Transparent consultation and co-design**

Ensure consultation processes are ongoing and iterative—not one-off. The survey and Issues Paper signal the roadmap’s commitment to continued engagement; NRI should institutionalise mechanisms for community feedback, dispute resolution, and shared priority setting over the life of facilities.

Support place-based partnerships with local Aboriginal and Torres Strait Islander communities, consistent with our University’s OSMP emphasis on authentic engagement and mutual benefit.

Summary—Rationale and alignment

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The Issues Paper invites focused input on Aboriginal and Torres Strait Islander knowledge systems and seeks practical directions for the roadmap. Our recommendations translate that intent into governance, ethics, capability, design and engagement settings that respect Indigenous authority and create conditions for sustainable collaboration across NRI.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A balanced approach requires both a dedicated capability and uplift across existing NRI platforms:

Dedicated capability:

- Establish an Aboriginal and Torres Strait Islander Peoples Research Data Commons as a national hub for Indigenous data governance, cultural protocols, and community-led research priorities.

- Design it with co-governance by Aboriginal and Torres Strait Islander leaders and researchers, ensuring interoperability with other NRI systems.

Cross-NRI uplift:

- Embed Indigenous data sovereignty principles and cultural protocols into all discipline-based NRIs.

- Provide incentives for collaboration, such as shared funding streams and joint governance arrangements.

- Develop training and accreditation programs for NRI staff to ensure cultural competence and ethical engagement.

This dual approach ensures Indigenous knowledge systems are respected and integrated across the research ecosystem while maintaining a dedicated space for leadership and innovation.

The rationale underpinning the above response is aligned with our University's One Sydney, Many People (OSMP) strategy. Incorporation must begin at the earliest stages—co-design—and extend through build, commissioning, data lifecycles, and everyday operations. It should be locally grounded, nationally consistent, and led with Indigenous participation to ensure research infrastructure genuinely supports Indigenous research priorities and methods.

1) Co-design from inception

Require co-design processes with Aboriginal and Torres Strait Islander partners in feasibility, business cases, functional briefs, site selection, and equipment specifications. The Walanga Wingara Mura Design Principles offer a tested framework for planning and design on Country that NRI can adapt nationally.

Use participatory design methods (yarning circles, community workshops, iterative prototypes) and ensure resourced participation (time, travel, remuneration).

2) Facility design, wayfinding and spaces for knowledge exchange

Incorporate dual naming, bilingual signage, cultural narratives, and materials that reflect local Country, consistent with the Walanga Wingara Mura approach—applied to laboratories, data centres, field hubs and shared spaces.

Provide dedicated spaces—physical and virtual—for Indigenous researchers, community partners and Elders to collaborate, store and handle sensitive materials, and undertake

cultural practices that support research and wellbeing. Our One Sydney, Many People Strategy (OSMP) commitments demonstrate the importance and feasibility of such spaces.

**3) Operational protocols and data lifecycles**

Implement operational guidelines that support Indigenous methodologies where appropriate (e.g. community-led sampling protocols; culturally safe handling of biological, environmental, and cultural materials; appropriate seasonal calendars and access rules). Embed Indigenous data sovereignty throughout the data lifecycle—collection, metadata, storage, access, reuse and archiving—with community-controlled access pathways and consent renewal mechanisms. The survey preview underscores the system’s need to manage submissions and data ethically; NRI should extend this to research operations.

**4) Workforce capability and roles**

Create dedicated roles across NRI facilities (e.g. Indigenous Engagement Leads and/or Cultural Protocols Officers and/or Data Stewards) who are empowered to guide operations and train staff.

Partner with universities to build a pipeline of Aboriginal and Torres Strait Islander HDR students, technicians and facility managers, aligning with our Ngarangun Indigenous Research Strategy to grow Indigenous researcher leadership and networks.

**5) Programmatic support and evaluation**

Fund ongoing community engagement programs, travel, and relationship maintenance as part of NRI operational budgets, not discretionary or time-limited grants.

Establish evaluation frameworks co-developed with Indigenous partners to monitor cultural safety, community benefit, research impact, and partnership health, in addition to traditional KPIs. The OSMP strategy emphasises accountability and measurable change that can be translated to NRI evaluation contexts.

**6) Interoperability with existing university strategies and standards**

Align NRI practices with existing institutional strategies—e.g. OSMP (culture and community; education and research; environment and sense of place) and Ngarangun—so facilities leverage established protocols, training, and networks rather than duplicating or fragmenting efforts.

**Summary—Rationale and alignment**

The Issues Paper seeks practical input on incorporating Indigenous knowledge systems in NRI design and operation. Our recommendations draw on tested university frameworks (Walanga Wingara Mura, OSMP, Ngarangun) to provide clear, implementable steps that NRI can adopt nationally, ensuring consistent cultural safety, ethical practice and meaningful collaboration.

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# 191

Mon, Dec 8, 2025, 11:42 AM Australian Eastern Daylight Time  
[ID: sbm399181b0e6cc91d7d78f6]

Title  
Prof

First Name  
Neena

Last Name  
Mitter

Organisation  
Charles Sturt University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Decisions about future NRI investments, including location, should be informed by:

- Indigenous leadership, consultation, action and evaluation, as appropriate, and
- Indigenous co-design, data sovereignty, cultural protocols, self-determination, and community benefit sharing

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An Indigenous-led Data Commons complemented by capability building across all NRI. This would support place-based data collection and storage, ensuring digital and other assets remain connected to and accessible by traditional owners.

Australia has unique Indigenous knowledge systems, endangered languages, and distinct cultural heritage. A nationally coordinated infrastructure would strengthen preservation, enable deep comparative research, and position Australia as a leader in ethical, large-scale humanities data stewardship.

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# 190

Mon, Dec 8, 2025, 11:38 AM Australian Eastern Daylight Time  
[ID: sbm39917d5b57e5cbf48ec6c]

Title  
Prof

First Name  
Sharon

Last Name  
Goldfeld

Organisation  
Murdoch Children's Research Institute

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Generation Australia supports the development of Aboriginal and Torres Strait Islander data governance and sovereignty protocols, including CARE principles. This should be an explicit multi-year funding investment across NRI providers with specific KPIs, with work led by Aboriginal and Torres Strait Islander people. Aboriginal and Torres Strait Islander people are leading GenV's development of First Nations data governance and sovereignty. This will be beneficial across disciplines due to Generation Australia's wide utility across sectors. If Generation Australia becomes an NRI provider, there will be opportunities to share the learnings with other NRI providers.

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# 188

Mon, Dec 8, 2025, 11:31 AM Australian Eastern Daylight Time  
[ID: sbm399177758be17ce51a318]

Title  
Prof

First Name  
Michael

Last Name  
Haugh

Organisation  
Language Data Commons of Australia (LDaCA)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

It is imperative to invest in infrastructure to support Aboriginal and Torres Strait Islander researchers and communities to maximise their use and repurposing of Indigenous data assets held in Australia and internationally. The Improving Indigenous Research Capabilities (IIRC) project has laid the foundation for a national integrated approach for supporting Indigenous researchers and communities that can be consolidated through expanded investment in the forthcoming 2026 NRI Roadmap and associated Research Infrastructure Investment Plans (2028-2032).

It is also imperative to invest in infrastructure that supports respect for Indigenous cultural protocols that support self-determination and promote benefit sharing with those communities when working with Indigenous data assets. The Language Data Commons of Australia (LDaCA) provides an operational model for how to implement these principles when working with Indigenous language data and their communities and stakeholders both in Australia and its region. This work can be consolidated and expanded through investment in the forthcoming 2026 NRI Roadmap and associated Research Infrastructure Investment Plans (2028-2032).

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

It is imperative to invest both in infrastructure that supports Aboriginal and Torres Strait Islander researchers and communities to maximise their use and repurposing of Indigenous data assets held in Australia and internationally, and to invest in infrastructure that supports respect for Indigenous cultural protocols that support self-determination and promote benefit sharing with those communities when working with Indigenous data

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assets. A standalone Aboriginal and Torres Strait Islander Peoples RDC facility is critical, and needs to be funded sufficiently to get off the ground and succeed. However, this is a huge agenda, and can't be placed all on one organisation, and it should not be treated as a one-stop shop: all the other NCRIS facilities need to take responsibility and have appropriate capacity to participate in advancing this agenda. It is thus critically important to recognise that Indigenous data assets are not managed by any one single organisation, and so increasing respect for Indigenous cultural protocols and enabling Indigenous self-determination and benefit sharing requires concerted investment across the NCRIS ecosystem.

We would add that it also important to recognise that Aboriginal and Torres Strait Islander peoples are diverse encompassing distinct First Nations that cross over many different linguistic and cultural groups. Different points of view being expressed should, therefore, not be taken as a sign of division or lack of shared common vision, but rather a natural function of this inherent diversity that needs to be appreciated and embraced through coordinated investment both in a standalone capability and in investment across the NCRIS ecosystem. NRI funding should be tied to demonstrated implementation of Indigenous Data Governance (IDGov) principles and further development of the Indigenous data workforce, including data stewards ,and increasing data literacy in communities.

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# 185

Mon, Dec 8, 2025, 11:23 AM Australian Eastern Daylight Time  
[ID: sbm399170315ee119491fd00]

Title  
Mr

First Name  
Dale

Last Name  
Holland

Organisation  
The Australian National University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
In addition to the Framework for Governance of Indigenous Data, please reference the AIATSIS Code of Ethical Conduct.  
This Code elaborates on principles of Indigenous self-determination, Indigenous leadership, Impact and value, and Sustainability and accountability, and creates a solid ethical framework that can scaffold future NRI investments.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
At the ANU, we are pleased to support the National Centre for Indigenous Genomics, which includes historical biological samples from Aboriginal and Torres Strait Islander Australians. NCIG has an external Indigenous-majority Board and is enshrined by a university Statute made under the Commonwealth ANU Act. This reflects the commitment that Indigenous peoples must lead decision-making regarding their data and knowledge systems.

It is time for NRI's efforts to support the Aboriginal and Torres Strait Islander Peoples Research Data Commons to be uplifted into a dedicated capability that enables transparent Indigenous-led governance over projects and investments.

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# 184

Mon, Dec 8, 2025, 11:16 AM Australian Eastern Daylight Time  
[ID: sbm399168a9b1e57492267b5]

Title  
A/Prof

First Name  
Ron

Last Name  
Hackney

Organisation  
Australian and New Zealand International Scientific Drilling Consortium (an AuScope project)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
In the short-term (over the next 1-2 years), there is a need to acknowledge non-traditional science outcomes and to recognise that research led by Aboriginal and Torres Strait Islander Peoples may not align with Western metrics for scientific success. In recognising this, NRI investment guidelines should explicitly allow for non-traditional outputs. For example, the following could be considered as valid and reportable outcomes: efforts to strengthen knowledge systems, cultural continuity, oral histories, relationships, and governance structures.

Over the medium-term (3-5 years), there is a need to align success and impact with Aboriginal and Torres Strait Islander Knowledge Systems and to co-design evaluation frameworks that redefine what success and impact look like. There is benefit in focussing on broad institutional adoption of ways to measure success differently and to move towards long-term relational indicators such as trust and continuity with communities, knowledge co-production, improved environmental custodianship and intergenerational benefits.

There is also a need to shift engagement from "just consultation" to "consultation AND leadership". Consultation alone is insufficient and what we are hearing from our scientist and First Nations collaborators is that a consultation-only approach has led to engagement fatigue.

To build structures for sovereign data and benefit sharing over the medium term (3-5 years), NRI needs to establish guiding national protocols for working with Aboriginal and Torres Strait Islander Knowledge Systems that will help NRI facilities engage appropriately

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and efficiently. These protocols should of course be co-designed with Aboriginal and Torres Strait Islander Peoples and aligned with sovereign data control and the CARE Principles for Indigenous Data Governance. The approach needs to be adapted across disciplines and regions, with a focus on how to manage two-way engagement.

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# 183

Mon, Dec 8, 2025, 11:07 AM Australian Eastern Daylight Time  
[ID: sbm3991613a7de541176e92f]

Title  
Ms

First Name  
Toni

Last Name  
Moate

Organisation  
Marine National Facility - CSIRO

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Recipients of NRI investment should be progressively expected to align with the principles outlined in the Framework, acknowledging that the pace of advancement will vary across organisations depending on the extent of corporate support in this domain. A practical, time-phased roadmap with guiding commitments should be applied across all phases.

Institutions should be evaluated based on their trajectory and commitment to continuous improvement towards the Framework, rather than adherence to rigid timelines, as implementation will differ according to the nature of the infrastructure and the diversity within the NRI landscape. In this context, an annual report detailing achievements within the preceding period, in alignment with the Framework, may be considered sufficient to demonstrate ongoing progress and compliance with its principles.

Existing NRI should integrate Indigenous knowledge systems into their infrastructure through co-design partnerships with Indigenous communities. Other mechanisms for alignment to consider could include:

Shared governance frameworks ensuring Indigenous representation across NRI decision-making, including on all boards.

Incentives for collaboration, such as joint funding streams and performance metrics tied to Indigenous engagement and benefit-sharing.

Workforce development programs to build Indigenous technical capability and cultural competency within NRI providers.

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This approach ensures that Indigenous knowledge is not siloed but embedded across Australia's research infrastructure landscape, while a dedicated capability provides the secure foundation needed for coordination, trust and frameworks for self-determination in an NRI context.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An uplift in the ARDC's Indigenous Research Data Commons (IRDC), in alignment with the government's Framework for Indigenous Data, should be supported. The needs of NRI providers should be canvassed to see what common elements occur across all providers (or a majority), such that a minimum threshold for an uplifted IRDC can be established and implemented. It is unlikely that NRI providers will make impactful progress at an individual provider level until this baseline support is established.

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# 179

Mon, Dec 8, 2025, 10:30 AM Australian Eastern Daylight Time  
[ID: sbm39913f1a31ccd6b84653c]

Title  
Dr

First Name  
Judith

Last Name  
Bishop

Organisation  
La Trobe University - School of Humanities and Social Sciences

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
This question is one that it is appropriate for Indigenous communities and leaders to respond to.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
This question is one that it is appropriate for Indigenous communities and leaders to respond to.

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# 178

Mon, Dec 8, 2025, 10:26 AM Australian Eastern Daylight Time  
[ID: sbm39913b9869cc85c02017d]

Title  
Dr

First Name  
Gillian

Last Name  
Brown

Organisation  
Council Heads of Australasian Herbaria

In what capacity are you responding?  
A representative of an organisation or group

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

CHAH acknowledges that Australian Traditional Owners have rights, responsibilities and spiritual and cultural connections with their lands, flora, and fauna, and that indigenous governance and sovereignty of biological knowledge and cultural heritage is fundamental for identifying and protecting Traditional Knowledge. We consider that a distributed biological collection network linking a national coordinating body, state nodes, and Traditional Owners is key to providing the capacity uplift required for appropriate management of biological collections containing traditional knowledge and digital heritage materials.

Investment is required to balance uplift of indigenous governance and sovereignty of traditional knowledge with uplift of cultural capacity in biological collections. While investment has enabled engagement between biological collections and Traditional Owners and development of protocols for gathering, storing, protecting and sharing traditional knowledge in biological collections, this investment hasn't covered all jurisdictions nor all of Australia's significant biological collections. Investment extending current collaborations among Aboriginal and Torres Strait Islander communities and biological collections would enable implementation of key Indigenous Cultural and Intellectual Principles in biological collections. A priority is the development of frameworks that ensure biological collections serve as 'appropriate keeping places' where specimens with traditional significance are handled according to best practices.

Engagement across our diverse communities is a strategic imperative to meet commonwealth and state Biodiversity, Conservation, and Biodiscovery regulatory requirements. An opportunity is provided by the responsibilities for co-managed Traditional Owner and commonwealth or state lands that are shared by all parties. Investment in strategic collaborations among Aboriginal, Torres Strait Islander, and biological collections communities would enable:

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- Establishment of best practice protocols, data and knowledge handling frameworks, and pathways for biodiversity data management to meet regulatory and permitting responsibilities
- Development of frameworks to enable Traditional Owner data sovereignty and enduring rights to access, maintain, control and benefit from their cultural and intellectual property
- Provision of opportunities for integration of Aboriginal and Torres Strait Islander traditional knowledge into the science of taxonomy
- Provision of a framework and pipeline to ensure free prior and informed consent around traditional knowledge data management in biological collections to ensure responsible data storage and management moving forward.

A distributed biological collection network linking a national coordinating body, state nodes, and Traditional Owners is needed to ensure a national approach to Indigenous Cultural and Intellectual Property (ICIP) principles that addresses priority research and collections development drivers.

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# 177

Mon, Dec 8, 2025, 10:22 AM Australian Eastern Daylight Time  
[ID: sbm3991384dd5e58028804c5]

Title  
A/Prof

First Name  
Roger

Last Name  
Osborne

Organisation  
Association for the Study of Australian Literature

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Future NRI investments should take into account the diversity of cultural protocols that influence the ways in which Indigenous communities perceive the data that is collected in the past, present and future. These investments should be built with a genuine and comprehensive consultation with Indigenous communities, and include appropriate and iterative frameworks of evaluation that are implemented at all stages of development. Any new NRI investments associated with Indigenous knowledge should be informed by a comprehensive evaluation of existing data and any data reparation that is deemed necessary. This evaluation and reparation should be completed as early as possible in the process of new data collection and description, and then be described in protocols of any future NRI investment.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
A genuine and comprehensive consultation with Indigenous communities should identify valid, sensitive and necessary intersections with related data commons. A dedicated and siloed Aboriginal and Torres Strait Islander Peoples Research Data Commons risks isolating collected data from meaningful associations. Nevertheless, data sovereignty should be honoured through adherences to the wishes and protocols of Indigenous communities.

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Department of Education

# 176

Mon, Dec 8, 2025, 10:10 AM Australian Eastern Daylight Time  
[ID: sbm3972646aefcbbc4e2b08d]

Title  
Prof

First Name  
Daniel

Last Name  
Angus

Organisation  
ARC Centre of Excellence for Automated Decision Making & Society

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Future NRI investments should be guided by a staged, multi-year commitment, beginning immediately and ramping over the next 5-10 years, to embed cultural protocols, self-determination, and benefit-sharing as core infrastructure requirements rather than optional add-ons. This means ensuring all new and renewed NRI capabilities adopt the Governance Framework for Indigenous Data from the outset, with mandatory CARE-aligned governance, Indigenous-controlled decision-making bodies, and resourcing for community-led consent and benefit-sharing processes.

A key early priority (years 1-3) is sustained investment in Aboriginal and Torres Strait Islander-controlled data architectures, alongside the digital-infrastructure uplift needed for Indigenous communities to meaningfully exercise data sovereignty. The ADM+S experience in closing the digital gap, particularly our work on secure data stewardship, Indigenous-led governance, and participatory digital research, shows that sovereignty and inclusion require infrastructure: trusted digital storage, community-operated access points, culturally safe compute environments, and long-term funding for Indigenous digital capability building.

Over the medium term (years 3-10), all discipline-oriented NRIs should be required to integrate Indigenous protocols and governance into their operational standards, supported by national training programs and cross-facility coordination. Taken together, this approach ensures future NRI investments do not just 'include' Indigenous knowledge systems, but are structurally designed to respect, protect, and elevate them.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An effective balance requires a dual-track approach: establishing a dedicated Aboriginal and Torres Strait Islander Peoples RDC with Indigenous governance and sovereignty at its core, while also mandating uplift across all discipline-oriented NRIs so Indigenous data protocols are embedded system-wide, not siloed. The dedicated Commons should serve as the authoritative standards-setter, responsible for CARE-aligned governance models, certified culturally safe storage and compute environments, and community-led protocols, and be resourced over the long term (5-10 years) to develop the digital foundations Indigenous communities need. At the same time, discipline NRIs should receive targeted investment to integrate these standards, supported by incentives such as requiring alignment with Commons protocols for NCRIS funding eligibility, shared training programs, and cross-facility interoperability frameworks.

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# 175

Mon, Dec 8, 2025, 10:04 AM Australian Eastern Daylight Time  
[ID: sbm399126fb91e52e229ab14]

Title  
Dr

First Name  
Tom

Last Name  
McGoram

Organisation  
Heavy Ion Accelerators

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

HIA supports the establishment of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability as described in the Roadmap Issues Paper. This should begin immediately, and funding should be committed for at least the next decade to demonstrate commitment to First Nations stakeholders, ensure continuity of effort, and ensure embedding of appropriate data-related practices in NRI. The capability should act as a central, enabling resource for both researchers and other research infrastructures as they seek to integrate Aboriginal and Torres Strait Islander knowledges with Western knowledges. See response to the next question for a possible model for realisation of the capability.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Rather than pursuing these options as separate trajectories, the Aboriginal and Torres Strait Islander Peoples Research Data Commons could be established through an integrated, staged model that links directly with identified uplift opportunities. This approach would enable the capability to absorb practical lessons from early initiatives, distil them into enduring operating principles, and progressively build towards a national, mature research infrastructure.

The initial phase could comprise targeted, collaborative projects that align with priorities identified in this Paper—particularly those requiring coordination across multiple NCRIS facilities. For example:

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- **Data governance and knowledge integration:** An early focus could be on establishing data governance frameworks to support the respectful integration of Aboriginal and Torres Strait Islander knowledge of water resources, water management, and groundwater flows with research using groundwater dating methods. This work would involve multiple NCRIS partners and could include engagement with Indigenous Ranger programs and Indigenous ecological knowledge.
- **Iterative improvement and expansion:** Insights gained during the first year would inform refinement of the Data Commons framework before extending its focus to other opportunities, such as collaboration on sustainable fishing and reef management, for example. These projects would draw on Aboriginal and Torres Strait Islander knowledge and stewardship of marine and coastal environments, and align with NCRIS initiatives such as CoastRI, leveraging the expertise of multiple NCRIS providers.

Through this approach, best-practice models, shared expertise, and practical tools could be systematically developed and disseminated across the national research infrastructure and broader research community.

Crucially, First Nations leadership and participation must underpin every stage of the process—from setting priorities and designing activities to implementation and governance—ensuring that the Data Commons reflects and respects Aboriginal and Torres Strait Islander values, knowledge systems, and aspirations.

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# 169

Mon, Dec 8, 2025, 08:55 AM Australian Eastern Daylight Time  
[ID: sbm3990e87efacccc0aad251]

Title  
Prof

First Name  
Coral

Last Name  
Warr

Organisation  
La Trobe University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

To ensure future NRI investments uphold cultural protocols, self-determination, and benefit sharing, the 2026 NRI Roadmap should embed Aboriginal and Torres Strait Islander governance and leadership as core principles across all stages of design, investment, and operation. Respecting Indigenous data governance is not a one-off activity but a structural commitment that requires clear timeframes and accountability.

Short term (1-2 years):

The first step would be to operationalise the CARE principles with the introduction of clear national guidelines and processes on how they should be interpreted and implemented. This activity could be undertaken by the ARDC's HASS and Indigenous Research Data Commons or, a dedicated Indigenous Peoples Research Data Commons, and rolled out across the NRI projects over the next 2 years.

Medium term (3-5 years):

Co-design and implement a national Aboriginal and Torres Strait Islander Peoples Research Data Commons, governed by Indigenous-led institutions and aligned with the Australian Government's Framework for Governance of Indigenous Data.

Develop funding and partnership models that incentivise collaboration between NRI providers and Indigenous communities.

Embed Indigenous leadership positions within NRI programs to ensure continuous representation in decision-making and research translation.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

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Achieving an appropriate balance requires a hybrid, systems-first approach: invest in a dedicated, Indigenous-led Research Data Commons as a national leadership, governance, and interoperability hub – while concurrently funding targeted uplift across discipline and theme-oriented NRIs so those systems can operate in alignment with the Commons’ governance, technical standards and cultural protocols.

The next step could be to establish the equivalent of an Indigenous Consumer Panel of members with lived experience, where members are invited to work with NRI projects and provide their indigenous knowledge and expertise to help inform the design and execution of projects. This may help to ensure that the FAIR and CARE principles are implemented appropriately for each specific project and bring an interdisciplinary aspect to the project.

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# 168

Mon, Dec 8, 2025, 08:50 AM Australian Eastern Daylight Time  
[ID: sbm3990e4457ee562298dc0b]

Title  
Dr

First Name  
Lisa

Last Name  
Yen

Organisation  
Microscopy Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Microscopy Australia recognises the importance of self-determination and ensuring that future NRI investments respect cultural protocols, but do not have sufficient expertise to contribute further to this question.

.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
As shared by ANFF, Microscopy Australia agrees that a dedicated Indigenous led liaison group would be a beneficial uplift in NRI ability to engage. All successful interactions need to be led by the needs and knowledge that is held by our first nation's people. Finding a way to have NRI professionals interact with those needs and knowledge in a respectful and meaningful way would be a bonus for all.

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# 166

Mon, Dec 8, 2025, 04:17 AM Australian Eastern Daylight Time  
[ID: sbm398ef443d9f07b3c19411]

Title  
Dr

First Name  
Beryl

Last Name  
Morris

Organisation  
TERN Australia

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

TERN strongly supports the dual-trajectory approach outlined in the Issues Paper. As a national research infrastructure with continental reach and established relationships with Traditional Owners across Australia's diverse landscapes, TERN is well-positioned to contribute to both pathways.

Immediate actions (2026-2027):

- Establish mandatory cultural competency and Indigenous Data Sovereignty training for all NRI workforce members, with particular focus on field-based staff
- Require all NRI providers to develop and publish Indigenous Engagement and Data Governance protocols aligned with CARE principles within 12 months
- Create dedicated funding streams within existing NRI for Indigenous ranger partnerships and Traditional Owner-led monitoring programs

Medium-term actions (2027-2030):

- Implement co-design frameworks ensuring Aboriginal and Torres Strait Islander communities have genuine authority in research design, data collection methodologies, and benefit-sharing arrangements for projects on Country
- Establish mechanisms for Traditional Ecological Knowledge to be recognised as equivalent to Western scientific data in environmental monitoring and modelling frameworks
- Develop career pathways and employment targets for Aboriginal and Torres Strait Islander peoples within NRI organisations, particularly in data management and field operations roles

Long-term structural changes (2030+):

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- Embed Aboriginal and Torres Strait Islander governance representation at board and executive levels across all relevant NRI providers
- Ensure research infrastructure investments on Country include benefit-sharing agreements that support community-determined outcomes
- Integrate Indigenous-led monitoring programs as core components of national environmental data infrastructure

TERN's existing relationships with Indigenous ranger groups and experience working across diverse Country positions us to pilot and refine these approaches, particularly in integrating Traditional Ecological Knowledge with Earth observation data and environmental modelling.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Both approaches are essential and complementary. TERN recommends a coordinated dual investment strategy that recognises different infrastructure types require different approaches.

For the dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons:

- Prioritise Aboriginal and Torres Strait Islander governance, control, and leadership from inception

- Invest in sovereign data infrastructure, secure repositories, and specialist expertise in Indigenous Data Sovereignty protocols
- Ensure this capability has authority to set standards and protocols that other NRI must adopt

For uplift across discipline-oriented NRI:

- Require all relevant NRI providers (including TERN) to demonstrate meaningful integration of Aboriginal and Torres Strait Islander knowledge systems, not tokenistic inclusion
- Create incentive mechanisms linking continued funding to demonstrated progress in Indigenous engagement, employment, and data sovereignty implementation
- Establish a coordination mechanism (potentially through the NRI Advisory Group) ensuring consistent standards whilst respecting the distinct requirements of different knowledge domains

TERN's role and perspective:

Environmental monitoring at continental scale inherently intersects with Aboriginal and Torres Strait Islander knowledge systems across all of Australia's diverse landscapes.

TERN can contribute significantly to the distributed uplift pathway by:

- Co-developing protocols for integrating Traditional Ecological Knowledge with Earth observation data and ecosystem modelling
- Partnering with Indigenous ranger programs to expand monitoring coverage in remote regions, ensuring rangers are recognised as essential members of Australia's environmental research infrastructure workforce
- Supporting community-led monitoring through appropriate technology transfer and capacity building
- Ensuring our data platforms implement both FAIR and CARE principles, with particular attention to cultural sensitivities around location data and species of cultural significance

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Design principles for effective coordination:

- Clear standards, flexible implementation: the dedicated capability should establish sector-wide standards, whilst discipline-oriented NRI adapt these to their specific contexts
- Adequate resourcing for both tracks: attempting this transformation without dedicated funding will result in tokenistic outcomes
- Accountability mechanisms: regular reporting against Indigenous Data Sovereignty and employment metrics should be mandatory for all NRI providers
- Knowledge exchange platforms: create forums where NRI providers share learnings, challenges, and innovations in integrating knowledge systems

The balance is not between these approaches but rather ensuring both are adequately resourced to create a genuinely transformed NRI landscape that elevates Aboriginal and Torres Strait Islander knowledge systems as the Issues Paper envisions.

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# 163

Sun, Dec 7, 2025, 10:32 PM Australian Eastern Daylight Time  
[ID: sbm398ea9b0b1a60df4b6d38]

Title  
Mr

First Name  
Mark

Last Name  
Stickells

Organisation  
Pawsey Supercomputing Research Centre (Pawsey) and the National Compute Infrastructure (NCI) through Prof Andrew Rohl

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Australia's Tier-1 HPC centres can enhance the elevation of Aboriginal and Torres Strait Islanders knowledge systems, respecting cultural protocols, supporting self-determination and promoting benefit sharing through:

- Data management platforms: Our centres support secure, culturally sensitive repositories for Indigenous data and heritage projects.
- Environmental and land management: HPC integrates Indigenous knowledge to improve bushfire mitigation, water sustainability, and ecosystem models.
- Cultural mapping and language preservation: Advanced computing processes large multimedia collections, aiding language reclamation and translation tools.
- Community-led research: Partnerships ensure HPC solutions address Indigenous priorities in health, environment, and cultural documentation.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
No comment.

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# 159

Sun, Dec 7, 2025, 07:23 PM Australian Eastern Daylight Time  
[ID: sbm398e0183e751ea6b08ed2]

Title  
Dr

First Name  
Louise

Last Name  
Ludlow

Organisation  
Australasian Biospecimen Network Association (ABNA)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

The Australasian Biospecimen Network Association (ABNA) requires that all new NRI investment include co-designed Indigenous governance models aligned with the Framework for Governance of Indigenous Data. Our association encourages early, funded engagement and long-term community partnerships as a condition of investment. We mandate the inclusion of culturally appropriate controls in data and sample platforms (e.g. access rules, custodianship, benefit sharing).

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

ABNA suggests funding both a dedicated Indigenous Data Commons plus mandatory uplift across discipline NRI facilities. The dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons needs positioning as the standards-setter and governance authority for Indigenous data practice. Implementation of Indigenous-aligned systems and training within a dedicated timeframe is required.

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# 154

Sun, Dec 7, 2025, 03:24 PM Australian Eastern Daylight Time  
[ID: sbm398d2652075171501e502]

Title  
Prof

First Name  
Wojtek

Last Name  
Goscinski

Organisation  
National Imaging Facility

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
To ensure future NRI investments respect cultural protocols, support self-determination and promote benefit sharing, meaningful and Indigenous-led partnerships must be embedded across all stages of imaging research and data management.

– NIF Experience and Context –

Since 2021, the National Imaging Facility (NIF) has supported an Indigenous Imaging Program at the University of Newcastle and the Hunter Medical Research Institute, in collaboration with the Wollotuka Institute, and we support research projects focused on Indigenous health across other NIF sites.

These initiatives focus on building trusted relationships with local Aboriginal communities and enabling both Indigenous-led imaging research and research addressing community-identified health needs.

Drawing on this experience, NIF proposes the following integrated actions to guide future NRI investments:

- Embed Indigenous-led governance, ensuring Aboriginal and Torres Strait Islander communities maintain control, ownership, and authority over imaging data and its use.
- Co-develop culturally informed protocols for the collection, access, sharing, and storage of imaging data, respecting cultural sensitivities and aligned with Indigenous Data Sovereignty and the Australian Government's Framework for Governance of Indigenous Data.

- Engage Elders, community organisations, Indigenous researchers and Indigenous health services early and throughout project lifecycles, ensuring data governance, consent, and benefit-sharing approaches are shaped by cultural authority.
- Invest in Indigenous workforce development, including training and supporting Indigenous researchers, imaging professionals, and data specialists to participate in and lead imaging research.
- Collaborate with a future Indigenous Research Data Commons to ensure consistent national practices, interoperability, and alignment with cultural protocols across distributed NRI facilities.
- Recognise the breadth and depth of Aboriginal and Torres Strait Islander knowledge systems, acknowledging that NIF does not speak on behalf of communities and that broader consultation across regions remains essential.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Imaging is uniquely sensitive and therefore requires deep trust. Because imaging data is highly personal, biological, and culturally significant, NIF cannot meaningfully contribute to Indigenous health outcomes unless we have a clearly defined, Indigenous-led role in community engagement and data governance.

For this reason, NIF supports a balanced approach—one that invests in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons while also uplifting Indigenous capability within discipline-specific NCRIS programs like NIF. Both approaches are essential for safe, respectful, and impactful imaging research.

— National Indigenous Data Commons —

We support the establishment of a national, Indigenous-controlled Data Commons to provide:

- culturally safe governance;
- Indigenous Data Sovereignty and control;
- consistent FAIR and CARE principles;
- national protocols for handling sensitive cultural, health and imaging data; and
- frameworks over how data is accessed, used, shared, and stored.

A national Data Commons is essential for cultural consistency and sovereignty, particularly given the heightened sensitivities surrounding imaging data.

However, the Data Commons alone cannot deliver the discipline-specific expertise required for safe imaging practice. Imaging workflows involve complex safety protocols, specific consent processes, technical interpretation, and long-term community relationships—areas where NIF has unique responsibilities.

— Uplift Within Existing NCRIS Capabilities —

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To ensure imaging research supports Indigenous health priorities, NIF must be an active, Indigenous-led participant within the broader ecosystem.

This includes:

- embedding Indigenous governance in imaging research and imaging datasets;
- developing culturally safe imaging protocols and consent pathways;
- expanding Indigenous-led imaging initiatives across NIF facilities;
- forming sustained partnerships with Indigenous health organisations and community; and
- supporting Indigenous researchers and technical specialists in imaging and data science.

Without this discipline-embedded role, imaging research cannot ethically or effectively contribute to Indigenous health outcomes.

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# 148

Fri, Dec 5, 2025, 05:07 PM Australian Eastern Daylight Time  
[ID: sbm398336db57e6c0ddb4fe3]

Title  
Mr

First Name  
Ralph

Last Name  
Marszalek

Organisation  
The University of Queensland

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We commend the ambition to emphasise Aboriginal and Torres Strait Islander knowledge systems within the context of the NRI Roadmap. This shows that the Department has taken the wealth of Indigenous-focused research infrastructure feedback it received earlier in 2025 as an indicator of the sector's desire to focus on this important topic.

We present below, some core principles for action that we believe will enable a foundational shift in the way the 2026 Roadmap will address challenges relating to Indigenous knowledge systems and their place within our national research infrastructure.

Core principles for action:

1. Redesign core frameworks. Don't simply add Indigenous requirements; infrastructure should be built with Indigenous data sovereignty as a foundational principle, not retrofitted with Indigenous add-ons. Section 2.1.2, Section 2 hints at this ambition, but it must be made clearer within the 2026 Roadmap
2. Recognise Indigenous communities as knowledge holders and leaders - not as subjects requiring 'capacity building' or 'development'
3. Ensure that jurisdictions work together to ensure best-practice re: Indigenous research data management tool, programs, and protocols. Differentiated approaches are needed with respect to ethics and governance.
4. Accommodate Indigenous epistemologies - Infrastructure must support Indigenous understanding of Country as an active entity with agency, and relationships with land, water, and other-than-human beings
5. Evaluate protective measures - Ensure 'protections' serve Indigenous interests rather than creating barriers to Indigenous-led research.

Potential timeframe and actions:

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Year 1: Establish a dedicated capability with an ability for oversight of Indigenous data governance standards. Mandate Indigenous governance at decision-making level for all relevant infrastructure. Embed CARE principles alongside FAIR as baseline requirement. Years 2-3: Redesign infrastructure with Indigenous data sovereignty as foundational principle. Build technical systems supporting Indigenous epistemologies. Implement accountability mechanisms.  
Success measure: Indigenous researchers find infrastructure naturally responsive and supportive, without constant negotiation.

We note that some of the actions relating to Indigenous Research Data Commons capability are already being undertaken under existing NCRIS investments. A brief, exemplar case study is presented below.

The Social Science Research Infrastructure Network (SSRIN; <https://arcd.edu.au/project/social-science-research-infrastructure-network>), a new project led by UQ, with co-investment from ARDC, ABS, Monash University, ANU and UWA, includes an Activity Stream on developing Indigenous Data Guidelines in the context of government administrative data.

Some Aboriginal and Torres Strait Islander peoples have had limited trust in data collections due to not experiencing any benefits, but in fact sometimes harm, from data collecting, analysing, and reporting. Additionally, researchers are lacking guidance on the appropriate use of Indigenous-identified data in administrative datasets. Collecting and using Indigenous-identified data may not demonstrate (Indigenous) social license and may undermine ethically responsible research, in turn creating uncertainties in research processes and tensions with Indigenous communities

The SSRIN is developing valid and accessible protocols for analysing and reporting Indigenous-identified data that increase the likelihood that Indigenous people and communities benefit from government administrative data research, while in turn minimising the risk of inappropriate use. This aims to contribute to a long term vision where Australia leads in ethical and inclusive data use, ensuring Indigenous peoples and communities directly benefit from how administrative data are analysed and reported.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Australia needs both capabilities, but each must have a clear authority structure.

Why both are necessary:

- Indigenous knowledge intersects with every research domain (environment, health, language, social systems) - requiring distributed capability
- Indigenous priorities need independent infrastructure serving their interests - requiring dedicated capability
- Siloing Indigenous research reproduces problems, and so does making it a tick-box add-on.

The dedicated capability should have:

- The knowledge and ability to set standards for Indigenous data governance across all research conducted in association with NRI projects
- Decision-making power in approving developments affecting Indigenous data

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- Resource allocation authority to direct investment toward infrastructure demonstrating genuine Indigenous governance
- Independent funding not dependent on other infrastructure priorities
- Active research capability serving Indigenous priorities.

This distributed capability must mean substantial structural change:

- Infrastructure rebuilt with Indigenous data sovereignty as foundational principle (not adapted with add-ons)
- Indigenous governance at decision-making level as baseline requirement
- Default operating procedures assume Indigenous governance; exceptions require justification
- Accountability to Indigenous authority on how well infrastructure serves Indigenous interests.

The relationship:

The dedicated capability sets standards, while discipline-oriented infrastructure operates within those standards and demonstrates an accountability to Indigenous authority. This ensures Indigenous knowledge systems shape what's considered normal in research infrastructure, rather than perpetually negotiating accommodation, as referenced in response to Item 2.

The approach must also be interdisciplinary, with investment beyond humanities. We draw reference to the examples presented by the Department in Section 2.1.2 of the Issues Paper, i.e., supporting existing NRI capabilities including areas such as biodiversity, ecology, and land/water management.

Additionally, there may also be Indigenous health/medical data and social science administrative data that are in scope for consideration, which all go beyond the humanities disciplines. A central capability, with multi-disciplinary expertise would allow for core cultural capacity and oversight. This central capability would also be able to liaise with the multiple area-specific NRI/NCRIS facilities with the disciplinary diversity that they bring.

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# 147

Fri, Dec 5, 2025, 04:59 PM Australian Eastern Daylight Time  
[ID: sbm398330b328e6155558489]

Title  
Dr

First Name  
Chris

Last Name  
Hatherly

Organisation  
Academy of the Social Sciences in Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Future NRI investments must embed Indigenous Data Governance (IDG), Indigenous Data Sovereignty (IDS), and Indigenous Cultural and Intellectual Property (ICIP) principles from the outset. Building on initiatives such as the Improving Indigenous Research Capabilities project and the Language Data Commons of Australia, a dedicated Aboriginal and Torres Strait Islander Research Data Commons should be established as a discrete capability within the next 3-5 years. This capability should be co-designed with Indigenous communities, ensuring CARE principles (Collective benefit, Authority to control, Responsibility, Ethics) are operationalised. Long-term investment should also support Indigenous-led governance structures, workforce development, and integration of Indigenous knowledge systems into national research priorities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A dual-track approach is required. On the one hand, a dedicated Indigenous Data Commons is required to provide secure, Indigenous-governed repositories and tools. On the other, discipline- or sector-oriented NRI capabilities must be supported where relevant to embed Indigenous research and data protocols across their operations. Alignment can be achieved through national standards, shared metadata frameworks, and incentives for collaboration across providers. This will ensure Indigenous knowledge systems are both protected and integrated into broader infrastructures, enabling cross-disciplinary research while maintaining community control.

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# 146

Fri, Dec 5, 2025, 04:52 PM Australian Eastern Daylight Time  
[ID: sbm398329e070806c00062d7]

Title  
Dr

First Name  
Jane

Last Name  
Fitzpatrick

Organisation  
Australian National Fabrication Facility Ltd

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
We have no meaningful contribution to make here.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
A dedicated Indigenous led liaison group would be a beneficial uplift in NRI ability to engage. All successful interactions need to be led by the needs and knowledge that is held by our first nation's people. Finding a way to have NRI professionals interact with those needs and knowledge in a respectful and meaningful way would be a bonus for all. A group that can engage on Country and then concierge the right NRI partners for identified projects would bring about new research and access to the tools needed for innovation and development of indigenous knowledge into greater value for those communities. The NCRIS Community has a model for how this might be established through the foundation of Research Infrastructure Connected.

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# 141

Fri, Dec 5, 2025, 02:48 PM Australian Eastern Daylight Time  
[ID: sbm3982b8b8a3e68b43e908b]

Title  
Ms

First Name  
Molly

Last Name  
Ireland

Organisation  
CSIRO

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Future NRI investments could consider embedding Free, Prior and Informed Consent (FPIC) and Indigenous Cultural and Intellectual Property (ICIP) principles in all phases of research, to build researcher capability and protects community interests. Further information, specifically on how CSIRO has built capability to engage and partner well, can be found in the Productivity Commission's case study on CSIRO's Indigenous Science and Engagement Program, as part of Priority Reform 3 of the National Agreement on Closing the Gap ([https://assets.pc.gov.au/2025-10/priority-reform-3-csiro\\_0.pdf?VersionId=QBG6kmZq00uL1UbJZ22Uzp9SwPQ26Em](https://assets.pc.gov.au/2025-10/priority-reform-3-csiro_0.pdf?VersionId=QBG6kmZq00uL1UbJZ22Uzp9SwPQ26Em)).  
With particular reference to biobanking infrastructure, consideration could be given to the development of provisions that ensure Indigenous data sovereignty, First Nations-led governance, and culturally safe biobanking practices (part of Recommendation 3 from CSIRO Futures Biobanking report - <https://www.csiro.au/en/work-with-us/services/consultancy-strategic-advice-services/CSIRO-futures/Health-and-Biosecurity/Biobanking>). Work on this could be commenced immediately and completed within 5 years, either as a stand-alone activity or as part of a larger effort to establish a national governance framework for human health biobanking.

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# 139

Fri, Dec 5, 2025, 01:26 PM Australian Eastern Daylight Time  
[ID: sbm39822b4e18e6e5d4282a4]

Title  
Dr

First Name  
Miranda

Last Name  
Smith

Organisation  
The Peter Doherty Institute for Infection and Immunity

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Firstly, Aboriginal and Torres Strait Islander peoples must be involved in these discussions and in the development and implementation of these strategies for the NRI. We encourage this to be done as soon as possible and in an equitable, consultative and sustainable manner.

It is essential that all NRI facilities provide culturally safe and appropriate methods for engagement with and involvement of Aboriginal and Torres Strait Islander peoples, particularly those that require collection, handling or distribution of specimens or data from Aboriginal or Torres Strait Islander peoples. This may require alternative protocols for engagement, involvement or access to ensure that the facility operates in a culturally appropriate way. Resources should also be dedicated to training non-Indigenous staff and platform users to do so appropriately.

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# 138

Fri, Dec 5, 2025, 01:10 PM Australian Eastern Daylight Time  
[ID: sbm39825e8f3950d1094bd31]

Title  
Prof

First Name  
Pieter

Last Name  
Eichhorn

Organisation  
Curtin University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Curtin University considers it essential that future NRI investments embed Indigenous leadership, cultural protocols and the principles of self-determination from the outset. Over the next 3-5 years, national coordination should prioritise Indigenous-designed metadata standards, culturally governed access controls and data stewardship models that reflect the CARE Principles and the expectations of Indigenous communities. At present, valuable Indigenous research data spanning diverse formats and domains are typically held in institutional storage systems and repositories that lack culturally appropriate metadata schemas and do not provide access mechanisms aligned with cultural protocols. Curtin supports a nationally consistent approach to strengthening the cultural integrity of research infrastructure, including a dedicated Indigenous-led program to design metadata frameworks, uplift community-controlled governance tools, and expand the cohort of Indigenous experts involved in NRI governance and decision-making. Long-term investment in capability building, co-designed training and sustained partnerships with Indigenous communities will be critical to ensuring benefit-sharing and the realisation of self-determined research outcomes.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Curtin University considers that achieving an effective balance between a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons and uplift across discipline-specific NRIs requires a complementary, dual-track approach. A central, Indigenous-led capability should provide authoritative guidance, governance frameworks and shared services, while discipline and theme-oriented NRIs embed these principles within their own infrastructures, workflows and workforce capability.

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A dedicated national capability could act as the primary steward of Indigenous Cultural and Intellectual Property (ICIP) principles in research infrastructure. This entity should be Indigenous-designed and Indigenous-governed, and responsible for developing nationally consistent frameworks for ICIP management, culturally aligned metadata schemas, access protocols, and principles for ethical data linkage and reuse. It could also maintain a suite of centralised services, such as culturally governed authentication models, community-controlled access settings, secure data environments and digital preservation standards, that NRI providers can integrate into their platforms. Importantly, it should support evaluation, accreditation and advisory functions to ensure that digital preservation methods and repository designs appropriately reflect cultural protocols and community expectations.

To balance central coordination with sector-wide uplift, discipline and theme-based NRIs must incorporate Indigenous data governance as a core requirement, not an optional add-on.

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# 136

Fri, Dec 5, 2025, 12:20 PM Australian Eastern Daylight Time  
[ID: sbm398231003850a8f169472]

Title  
Mr

First Name  
Andrew

Last Name  
Gilbert

Organisation  
Bioplatforms Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Indigenous Knowledge Systems will impact on the breadth of Australia's Life Science research, including describing and protecting Australia's biodiversity, enhancing our nation's agricultural productivity and security and delivering innovative health and medical interventions across society.

Working definitions to permit researchers to adopt and immerse their research agendas within one or more Indigenous Knowledge system frameworks, paying due respect to First Nations' people and place and normalising rightful benefit sharing will reduce barriers for enhanced collaboration.

In practice, this may result in a series of Indigenous Knowledge System implementation plans that direct NRI on how to engage, with whom, when and what anticipated shared benefits might arise.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Development of a critical mass knowledge hub that provides a referential context for the diversity of indigenous knowledge systems and implications would be beneficial across NRI. However, a singular monolithic response would likely not address the diversity of scenarios and implications of indigenous knowledge systems in different categories of NRI. For instance, experimental science will have markedly different dynamics to that of observational research, or cultural examinations.

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Discipline-focused NRI guidance, support and dedicated resourcing to uplift their understanding and adoption of relevant indigenous knowledge systems, attuned workforce and collaborative structures would be beneficial. However, consistency and standards, developed and guided through a dedicated and shared capability would strengthen the systemic response.

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# 135

Fri, Dec 5, 2025, 12:10 PM Australian Eastern Daylight Time  
[ID: sbm398228310d80ed703cc9b]

Title  
Dr

First Name  
Andre

Last Name  
Zerger

Organisation  
Atlas of Living Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
We feel this response is best addressed by Aboriginal and Torres Strait Islander Peoples

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
The Atlas of Living Australia supports the proposed change to the definition of National Research Infrastructure (NRI) in the 2026 Roadmap because it better reflects the realities of modern research infrastructure delivery. Including highly skilled personnel alongside assets and facilities acknowledges that expertise is fundamental to operating and innovating infrastructure, ensuring its full value is realised. The clarification that NRI may be single-sited, virtual, or distributed is critical in an era of digital platforms and interconnected systems, while maintaining accessibility and national significance as core principles.

It is helpful that the definition recognises the importance of distributed infrastructure. For example, in the biological collections sector smaller, target infrastructure investments (e.g. digitisation equipment for herbaria and museums) combined with an investment in skills, can deliver significant benefit for many years, with minimal further capital outlay. Such sectors are well suited to delivering national capability, coordinated through a federated model.  
This updated definition strengthens Australia's ability to deliver leading-edge research, supports workforce sustainability, and positions our NRI system to remain globally competitive and responsive to emerging needs.

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# 133

Fri, Dec 5, 2025, 11:33 AM Australian Eastern Daylight Time  
[ID: sbm398206314de66e6752381]

Title  
Prof

First Name  
Jacek

Last Name  
Jasieniak

Organisation  
Monash University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Monash University is supportive of the two complementary trajectories outlined in the Issues Paper. To ensure future investment respects cultural protocols, supports self-determination, and promotes benefit sharing in line with the Framework, we note the following:

Immediate priorities

It is vital that repositories are Indigenous-led and governed. These should be developed in accordance with both the FAIR (Findable, Accessible, Interoperable, Reusable) and CARE (Collective Benefit, Authority to Control, Responsibility, Ethics) principles.

Meaningful decision-making positions should be created for suitably experienced and skilled Aboriginal and Torres Strait Islander researchers and data governance experts. These roles must have authority in determining governance models, access protocols, and benefit-sharing arrangements.

Determining data ownership, especially for legacy or composite datasets, must be an early step. Clear protocols should underpin decisions about access, use, and benefit sharing. The systems developed must support mediated access, enabling knowledge holders to engage directly with and control access to their data.

It is important to note that the development of data management tools and platforms are complex to develop, make secure, and be useful to communities (rather than an administrative burden). Ongoing partnerships with communities and centering Aboriginal

and Torres Strait Islander research leaders in the development of these tools and platforms will be key to their success.

While community consent remains fundamental, care should be taken to avoid overburdening communities with repeated requests for approval that do not result in research outcomes. This can be mitigated through coordinated engagement frameworks and transparent feedback loops to demonstrate how input has influenced research feasibility and design.

Dedicated programs should be established to support and mentor Indigenous researchers, data stewards, and technical specialists. This includes funding for training and career pathways within data infrastructure governance, management, and curation.

#### Medium-term priorities

The Framework for the Governance of Indigenous Data provides an excellent foundation; however, it should be explicitly linked to an overarching Indigenous Cultural and Intellectual Property (ICIP) protocol. This would clarify expectations around ownership, custodianship, and control of both historical and contemporary data. As the Australian Government's Office of the Arts advances ICIP legislation, corresponding data protocols should be incorporated into NRI policy and practice.

The Language Data Commons of Australia (LDA) offers a strong foundation for piloting mediated access models. Continued investment would help refine approaches to data discoverability and ethical access. Such pilots should also consider the staffing resources required to liaise with knowledge holders and communities when data access requests are made.

Universities and research organisations hold extensive Indigenous-related data, much of it unpublished or embedded within broader datasets. Targeted investment is needed for institutions to audit these holdings, identify Indigenous data, and apply ICIP protocols. Following these audits, new or expanded public data portals (building on models like LDA) could enable Aboriginal and Torres Strait Islander peoples to discover, access, and manage data related to them.

#### Long-term system strengthening

Future NRI governance should embed Aboriginal and Torres Strait Islander representation at all levels, including policy, technical design, and operational management. Sustainable investment is needed to ensure that Indigenous data sovereignty is not just an aspiration, but an operational reality within the national research infrastructure ecosystem.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Achieving the right balance between a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons and broader uplift across the NRI system requires both Indigenous leadership and cross-disciplinary coordination.

The design and governance of the Data Commons should be Indigenous-led, guided by senior Aboriginal and Torres Strait Islander research leaders and experts. Immediate investment is needed to strengthen the Indigenous researcher pipeline, ensuring

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meaningful participation at every stage of design, implementation, and long-term operation.

A critical step is a national audit of data relating to Aboriginal and Torres Strait Islander peoples across disciplines and institutions. This audit would provide the evidence base to define the scope, interoperability, and governance of the Data Commons and identify areas where capability uplift is required within existing NRI facilities.

Incentives for alignment should include mechanisms that:

- Support Indigenous researchers to build and sustain research careers;
- Encourage partnerships between communities, industry, government, and research organisations; and
- Promote collaboration and knowledge sharing across NRI facilities to embed Indigenous Data Sovereignty principles.

The dedicated Data Commons should be adequately funded, flexible, and responsive to community priorities, serving as a model of best practice for integrating Aboriginal and Torres Strait Islander knowledge systems across the broader NRI landscape.

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# 128

Fri, Dec 5, 2025, 09:39 AM Australian Eastern Daylight Time  
[ID: sbm39819d7979e62fb03bec2]

Title  
Ms

First Name  
Louise

Last Name  
Soroka

Organisation  
Geoscience Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

\* Early and ongoing engagement with Indigenous communities in project design and governance.

\* Investment in Indigenous-led research infrastructure and data stewardship roles.

\* Clear ICIP and FPIC guidelines for all NRI investments to follow along with reporting requirements to ensure compliance

\* Ensure collective work considers and addresses data custodianship so that it is clear what can or can not be done with the data and associated knowledge

\* Timeframe - must be ongoing, relationship building take years before any programs or projects can start

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

\* Funding incentives for collaboration with First Nations groups and inclusion of Indigenous perspectives in relevant discipline and theme-oriented NRI.

\* Design approaches should include First Nations perspectives from the initial development including how to approach the design - all stages should include First Nations perspectives, the community the investment is for and about should be intrinsically involved from the start through to the finish.

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# 127

Thu, Dec 4, 2025, 07:25 PM Australian Eastern Daylight Time  
[ID: sbm397e8fc6db814b4e540f9]

Title  
Prof

First Name  
Ricardo

Last Name  
Ruiz Baier

Organisation  
MoCaO (Mathematics of Computation and Optimisation)

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Not relevant to MoCaO.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Not relevant yet to MoCaO.

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# 125

Thu, Dec 4, 2025, 04:30 PM Australian Eastern Daylight Time  
[ID: sbm397def758f81209358393]

Title  
Dr

First Name  
Felicity

Last Name  
Flack

Organisation  
Population Health Research Network

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
**Future NRI investments must embed Indigenous Data Governance and Sovereignty principles across all capabilities. This requires dedicated, Indigenous-led investment to ensure Aboriginal and Torres Strait Islander peoples have authority over how their data is collected, managed, and used. Key actions include co-designing governance frameworks with Indigenous communities, aligning with the Australian Government's Framework for Governance of Indigenous Data, and promoting benefit sharing. Capacity building should be prioritized to strengthen Indigenous technical and data stewardship skills. These protocols should apply across all NRI facilities, not just dedicated capabilities.**

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# 122

Thu, Dec 4, 2025, 03:02 PM Australian Eastern Daylight Time  
[ID: sbm396e4ae605224424c4aef]

Title  
Prof

First Name  
Janet

Last Name  
McCalman

Organisation  
University of Melbourne

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Close co-ordination with Indigenous Data Sovereignty team over protocols inclusion, linking and sharing of Indigenous data

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
The ARCHER Historical Database of the Australian People, built from AI rendered vital registrations from each State and Territory, will include Indigenous Australians, enabling history and life courses to be studied both in isolation and in the context of the whole population, providing more detailed history the divergent fates of colonised and colonisers in life outcomes, health, family formation, geographic and social mobility, military service and its effects etc. While the initial building of the database using AI and record linkage would need a technical workforce, ARCHER will offer communities of all kinds, including Indigenous ones, continuing individual and group and community projects enhancing life stories from resources in the NAA, the various state archives, the NAA and TROVE. This is a proved research methodology already successfully utilised for large reconstitutions of Aboriginal Victorians, Tasmanian convicts and First AIF men. The privacy of individuals can be protected with strict protocols and secure work platforms.

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# 119

Thu, Dec 4, 2025, 01:46 PM Australian Eastern Daylight Time  
[ID: sbm397d59dbba99256c42aab]

Title  
Prof

First Name  
Clare

Last Name  
Murphy

Organisation  
University of Wollongong

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
co-development and consultation wherever possible keeping in mind that relationships take time

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
co-development and consultation wherever possible keeping in mind that relationships take time

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# 117

Thu, Dec 4, 2025, 11:43 AM Australian Eastern Daylight Time  
[ID: sbm397ce8df6e998dff2a643]

Title  
Dr

First Name  
Tara

Last Name  
Martin

Organisation  
Tasmanian Department of State Growth

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Indigenous data governance is extremely complex. The Tasmanian Aboriginal community have expressed a desire for engagement with ongoing national conversations in this area, but did not have specific suggestions at this time.

This highlights that resources are very limited for First Nations organisations with many competing demands. It is important to ensure sufficient time is allowed for meaningful engagement.

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# 116

Thu, Dec 4, 2025, 11:25 AM Australian Eastern Daylight Time  
[ID: sbm397cd8bed8953348ddf10]

Title  
Dr

First Name  
Michelle

Last Name  
Heupel

Organisation  
Integrated Marine Observing System

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
NRI planning and investment should have the capacity to increase cultural awareness and support best practice amongst providers to ensure cultural protocols, self-determination, and benefit sharing are accommodated and embedded in NRI. Best practice will vary by field and domain and requires careful consideration as well as bespoke approaches based on the needs of Indigenous participants, communities and end-users. To achieve these objectives NRI programs could include compulsory cultural awareness training and establish dedicated benchmarks or milestones to measure progress in embedding culturally appropriate processes.

Establishing best practice and building two-way trust takes time and shouldn't be rushed. There is likely some initial work required to understand the relevance of various NRI by/for Indigenous participants, communities and end-users to inform actions to increase inclusion, co-design/co-delivery, capacity building, and achieving mutual benefit. This is a process that is likely to take years rather than months to fully embed within NRI systems, but is unlikely to succeed without dedicated actions and funding.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
incentives for alignment and collaboration across NRI providers.  
The answer to this question lies in part with the type of data being discussed. A central capability could be a powerful platform for preservation of Indigenous language and other collections of historical data/information. However, data being collected via active partnership projects, for example environmental observing, should be maintained in conjunction with the activity rather than in a centralised system. Amongst the reasons for

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the co-location of data with the activity are that activity participants need the flexibility to modify data conditions, approvals, access, and more. This type of agility requires direct connections, strong communication, and trusted systems.

The collection of data as well as the sharing of information back to communities and end-users is also a critical element of successful NRI. Doing this well requires knowledge of the data, but also knowledge of what the Indigenous participants, communities and end-users want or need to help meet their objectives. Systems need the agility to change data access settings if the community chooses to no longer share data openly, or vice versa. Thus, community needs or priorities might not be well served in a centralised system which can be difficult to modify. Data systems need clear metadata, including Indigenous data labels, and strong access controls to ensure the protection of sensitive data. Finally, training and capacity building for Indigenous students, rangers, community members and others should be facilitated to enable inclusion and growth of experience/expertise, increase data holdings, improve data systems, and enhance data sharing.

As noted above, data management and delivery systems need to be flexible enough to evolve with Indigenous needs in order to be suitable, respectful, and culturally relevant. Cultural protocols need to be identified, respected and accommodated. For example, Indigenous representatives in the National Marine Science Committee recommend establishing a National Aboriginal and Torres Strait Islander Marine Science Institute and a National Indigenous Peak Body for sea Country. These institutions could help determine the balance between centralised and dispersed data systems, set standards for data access and sharing, and support training and data delivery. Regardless of the mechanisms, a combined cultural and digital uplift is required to meet the varied data needs of Indigenous communities.

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**# 114**

Thu, Dec 4, 2025, 04:02 AM Australian Eastern Daylight Time  
[ID: sbm397b428cb099d2fcc66bd]

Title  
Prof

First Name  
Aidan

Last Name  
Sims

Organisation  
Australian Mathematical Society

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
This is a question that should be addressed to, and by, Aboriginal and Torres Strait Islander researchers and stakeholders.

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# 113

Wed, Dec 3, 2025, 06:25 PM Australian Eastern Daylight Time  
[ID: sbm39792905569936aa08e5b]

Title  
Mr

First Name  
Stephen

Last Name  
Forbes

Organisation  
Council of Australasian Museum Directors

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

**Build Capacity**

Lay the foundations for future collaborative endeavours

**Cultural Safety**

Ensure First Peoples communities are safe - this may differ for each community and/or organisation.

**Back to Country**

Bring collections to Country, giving self-determination for material in our care to First Peoples and building ethical and reciprocal partnerships with communities.

**Sharing Our Stories**

Develop a collaborative process to bring First Peoples living histories and cultures to other communities.

**Continuous funding, ongoing learning and development**

Aspiration for every FP Community is to Develop funding sources that give First Peoples Communities independence, capacity building, sustained development.

Education and training, mentoring is also vital for a healthy community.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

- Community-led decision making
- Community empowerment
- Community inclusion

No one community is the same as they are at different stages development. So ask the Community of their priorities and timelines.

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# 112

Wed, Dec 3, 2025, 02:24 PM Australian Eastern Daylight Time  
[ID: sbm397856217199ab8358a19]

Title  
Prof

First Name  
Frank

Last Name  
Bongiorno

Organisation  
Council for the Humanities, Arts and Social Sciences

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Recognising the centrality of data sovereignty to self-governance and self-determination, CHASS supports the proposal from the Improving Indigenous Research Capabilities (IIRC) project, led by Redmond Barry Distinguished Professor Marcia Langton AO FASSA, for an 'Indigenous research capability program to enable Aboriginal and Torres Strait Islander peoples and researchers ... to have access to effective research data tools.' This will require significant government investment if Indigenous protocols, community direction and control, knowledge sharing, data security, and the enabling of sound HASS research to inform evidence-based policy are to be achieved.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
There needs to be recognition that Indigenous knowledge will not invariably fit neatly into well-established categories in the HASS disciplines. NRI needs to be developed that will link often quite disparate institutions and databases, some national and some regionally or State/Territory-based. Moreover, investment in the capabilities of existing theme-based projects and databases, such as the Australian Dictionary of Biography and the Language Data Commons of Australia, needs to be on a scale that will ensure ethical and responsible research. Databases needs to be capable of storing, preserving and making accessible audio and visual data in ways that recognise the particular characteristics of Indigenous knowledges, including the primacy of story and place.

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# 111

Wed, Dec 3, 2025, 01:57 PM Australian Eastern Daylight Time  
[ID: sbm39783d862595ce06811cb]

Title  
Prof

First Name  
Rufus

Last Name  
Black

Organisation  
University of Tasmania

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We recommend a phased, nationally coordinated approach to embed Indigenous Data Sovereignty across all NRI investments, guided by the Framework for Governance of Indigenous Data, the CARE Principles, and aligned with FAIR principles.

Immediate to near-term (0-3 years):

- Establish Indigenous Data Governance Boards for all relevant NRI capabilities, with majority Aboriginal and Torres Strait Islander membership and delegated authority over access, consent, and benefit-sharing.
- Standardise free, prior and informed consent (FPIC) workflows, including revocation pathways and culturally appropriate decision logs.
- Use digital tools that make cultural and ethical rules part of the data itself by tagging datasets with Traditional Knowledge and Biocultural Labels, and adding controls that limit access based on location or user role, so cultural protocols are automatically respected.
- Mandate benefit-sharing clauses in all NRI access and commercialisation agreements, supported by community IP registers.
- Require Indigenous co-design plans as a condition of NRI funding to ensure shared decision-making from inception.

Medium to long-term (3-10 years):

- Fund Indigenous data steward and brokerage roles embedded within NRI facilities, with clear professional development pathways.
- Co-design a national credential for Indigenous data governance, co-badged by Australian Research Data Commons (ARDC) and Indigenous organisations.
- Invest in regionally distributed, community-controlled repositories with sovereign storage and on-Country nodes.

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- Establish a National Indigenous Data Governance Maturity Model and Audit Framework, with annual self-assessments and biennial external reviews.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A balanced, nationally coordinated approach is essential. This should combine a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons with consistent capability uplift across all discipline-based NRIs. The Commons should act as a national hub for cultural authority, technical standards, and training, while discipline-based NRIs embed these standards within their own platforms. Key strategies include:

**Dedicated Indigenous Data Commons**

- Establish an Indigenous-governed national hub hosted by ARDC to set standards, steward culturally governed data environments, and provide assurance.
- Functions should include:
  - o Standards and compliance hub.
  - o Federated catalogues with culturally-aware metadata.
  - o Secure platforms for sensitive data.
  - o Community capability programs (training, micro-credentials, digitisation grants).
- Implementation timeline:
  - o Year 1: Establishment.
  - o Years 1-5: Build and scale.
  - o Years 5-10: Sustainment and maturity.

**Embedding Standards Across Discipline-Based NRIs**

- Require CARE-aligned governance and Indigenous participation in design.
- Mandate clear benefit pathways for communities and adherence to shared technical standards.
- Tie NCRIS operating funds to CARE and Framework compliance milestones.
- Require alignment plans and annual reporting.

**Enable Interoperability and Collaboration**

- Use common standards, easy translation between data formats, and simple connections that allow platforms to share information.
- Establish cross-NRI working groups and pooled investment in Indigenous data skills.
- Coordinate policy settings to maintain coherence between the Commons and wider NRI system.

**Incentivise Community Outcomes**

- Provide competitive funding for NRIs that co-deliver outcomes such as Sea Country stewardship or biobanking governed by Aboriginal organisations.

**Preferred Design Model**

- Adopt a hub-and-node model: an Indigenous-led national hub supported by distributed nodes embedded within sector NRIs and major research institutions. This ensures national consistency while enabling local engagement and responsiveness.

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# 110

Wed, Dec 3, 2025, 01:52 PM Australian Eastern Daylight Time  
[ID: sbm3978388a2095c264d967e]

Title  
Prof

First Name  
Grainne

Last Name  
Moran

Organisation  
University of New South Wales

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Future NRI investments must embed Indigenous-led partnerships and governance from the outset, ensuring Aboriginal and Torres Strait Islander communities retain control, ownership and authority over data and its uses. Culturally informed protocols for the collection, access, sharing and storage of data should be co-developed with Indigenous communities, grounded in Indigenous Data Sovereignty principles and aligned with the Australian Government's Framework for Governance of Indigenous Data.

Engagement with Elders, community organisations, Indigenous researchers and Indigenous health services should occur early and continue across the entire lifecycle of NRI projects, shaping approaches to data governance, consent and benefit sharing. Investment in Indigenous workforce development—including training and career pathways for Indigenous researchers, technical specialists and data professionals—is essential to support Indigenous leadership within NRI environments.

Coordination with emerging national initiatives such as an Indigenous Research Data Commons will be important to ensure consistent practices, interoperability and cultural safety across distributed research infrastructure. Finally, ongoing consultation with diverse Aboriginal and Torres Strait Islander communities is critical, recognising the breadth and depth of knowledge systems and the need for regionally responsive approaches.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Achieving the right balance requires recognising that a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons and discipline-specific NRI capabilities serve complementary purposes. A national, Indigenous-controlled Data Commons is

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essential to provide culturally safe governance, uphold Indigenous Data Sovereignty, ensure consistent FAIR and CARE principles, and establish national protocols for the access, use, sharing and storage of sensitive cultural, health and research data. At the same time, discipline-embedded uplift is necessary to ensure that Indigenous data governance principles are meaningfully enacted within specialised research workflows. Many areas of research—particularly those involving sensitive biological or personal data—require tailored consent processes, culturally informed protocols, specialised technical expertise, and long-term relationships with communities. These functions cannot be fully centralised in a Data Commons and must be embedded within domain-specific NRI capabilities.

A balanced approach would therefore involve:

- A dedicated Indigenous Research Data Commons providing national cultural governance, sovereignty, protocols, and frameworks for safe and respectful data use.
- Indigenous-led capability uplift within discipline-specific NRI, embedding culturally safe practice, consent processes, technical protocols, and partnerships with Indigenous communities, researchers and health services.

Alignment and collaboration across NRI providers will be essential. Mechanisms to support this include:

- Interoperability by design, with shared metadata standards, APIs and governance linkages between the Data Commons and discipline-specific infrastructure.
- Clear role delineation, where the Data Commons leads cultural governance and national protocols, while discipline-focused NRI lead the specialised technical, safety and workflow aspects of their domains.
- Joint Indigenous governance structures, such as a cross-NRI Indigenous Advisory Council with cultural authority and oversight across the ecosystem.
- Co-investment and shared planning, enabling coordinated projects designed under Indigenous governance to avoid duplication and fragmentation.
- Co-developed training programs that build Indigenous research, technical and data science capability across both the Data Commons and discipline-based NRI.

This combined model ensures cultural authority is centralised where appropriate, while retaining the discipline-specific expertise required for ethical, safe and impactful research.

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**# 108**

Wed, Dec 3, 2025, 10:28 AM Australian Eastern Daylight Time  
[ID: sbm39777d87af95d6f30425d]

Title  
A/Prof

First Name  
Linda

Last Name  
Pfeiffer

Organisation  
CQ University - School of Education and Arts

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Actionable outcomes will be clearly communicated, with implementation planned over a five-year timeframe and a formal review scheduled at the mid-point.  
Communities are progressing at different stages—should this be approached as a linear process, or do the stages overlap?

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# 103

Tue, Dec 2, 2025, 11:14 AM Australian Eastern Daylight Time  
[ID: sbm397281531343b45484cab]

Title  
Dr

First Name  
Tony

Last Name  
Willis

Organisation  
Australian Council of Deans of Science

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We support embedding Aboriginal and Torres Strait Islander communities' leadership and co-design as core principles for any NRI activity involving Indigenous knowledge or data. Guiding principles should include:

- Governance models co-designed with First Nations peoples.
- Decisions fully aligned with Indigenous Data Sovereignty principles.
- Long-term investment in relationships and culturally safe engagement, recognising that building and maintaining trust requires time and resourcing.
- In addition, we note that the Issues Paper uses the terms "Aboriginal and Torres Strait Islander" and "Indigenous", while other recent documents increasingly refer to "First Nations" communities. For consistency with the Issues Paper, ACDS has used the term "Aboriginal and Torres Strait Islander" in this submission. We suggest that the terminology ultimately adopted should be determined by Aboriginal and Torres Strait Islander peoples, and that—once agreed—it should be applied consistently across future documents.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A balanced, dual approach is essential. Key considerations include:

- A dedicated First Nations Data Commons:
  - A secure, sovereign, culturally governed platform.
  - A nationally consistent approach to culturally safe Indigenous data management.
- System-wide uplift:
  - All NRI facilities should embed culturally safe protocols and First Nations governance principles.

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- ACDS urges a nationally coordinated framework to avoid duplication and reduce burdens on Indigenous experts.

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# 101

Mon, Dec 1, 2025, 06:01 PM Australian Eastern Daylight Time  
[ID: sbm396ed0576b16ce2ba1504]

Title  
Dr

First Name  
Olga

Last Name  
Shimoni

Organisation  
RNA Innovation Foundry at The University of Western Australia

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Over the following 12-24 months, capacity-building initiatives should be implemented to enable Indigenous leadership in research and data stewardship, alongside formal benefit-sharing agreements that guarantee community authority over data use and outcomes. Continuous monitoring, transparent reporting, and regular consultation with Indigenous stakeholders should be maintained to ensure compliance and ongoing improvement.

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# 100

Mon, Dec 1, 2025, 05:59 PM Australian Eastern Daylight Time  
[ID: sbm396ecdef181648253b818]

Title  
Prof

First Name  
Paul

Last Name  
Roe

Organisation  
James Cook University

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

JCU strongly supports an NRI approach grounded in the Framework for Governance of Indigenous Data, the Closing the Gap Priority Reforms, and the principles of Indigenous data sovereignty. Ensuring future NRI investments respect cultural protocols, support self-determination, and promote benefit sharing requires both ethical infrastructure design and long-term capability outcomes.

Over the next 3-5 years, NRI should:

- Mandate adoption of CARE principles and culturally safe governance across all NRI programs, including Indigenous-led oversight bodies for any NRI assets that store, analyse or apply Indigenous knowledge.
- Resource genuine co-design with Traditional Owners.
- Invest in on-Country data storage, digital connectivity and community-controlled data environments, ensuring Indigenous communities retain authority over access and use.
- Develop training pipelines for Indigenous data stewards and technologists, hosted at universities with deep Indigenous research partnerships.
- Support Indigenous-led digital tools, such as language technologies, cultural mapping, environmental monitoring and community-managed databases.
- Establish agreed national purposes and indicator sets for Indigenous futures, aligned with the IRG indicator framework and companion measures for capability, resilience, institutional strength, ownership and substitution.
- Enable regular reporting cycles that show whether production, incomes and locally held assets are moving in the desired direction.

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This dual approach ensures that NRI investments are not only culturally safe and ethically governed, but also directly contribute to Indigenous self-determination, economic strength and long-term regional capability-building.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

JCU supports a dual-track approach in which a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons acts as the national engine room for Indigenous data governance, agreed metrics, and integrated data flows, while all mainstream NRI capabilities are required to align with, interoperate with, and contribute to this system. Note that without the uplift across all NRI, the Data Commons would be isolated and ineffective.

#### 1. Dedicated Indigenous Peoples Research Data Commons

The Commons should operate with Indigenous leadership at every level and be delivered at greater scale than current pilots (e.g., IIRC, LDaCA). Its role should include:

- Co-designing and maintaining core data models, indicators and longitudinal series that track Indigenous capability
- A federated national model with regional hubs, particularly in northern Australia, supported by on-Country storage, sovereign cloud hosting and integration with Ranger programs, Native Title bodies and Aboriginal Health Services.
- Establishing clear, upfront rules for ongoing administrative data supply from schooling, VET, higher education, employment, enterprise support and infrastructure programs, ensuring high-quality, routine data flows that do not require continual renegotiation.
- Embedding Indigenous governance at the framework level, ensuring cultural authority, data sovereignty and CARE principles, while enabling low-friction data use for agreed system purposes.

#### 2. Mandatory uplift across all discipline-based NRI

To avoid siloing Indigenous data, every NRI capability should:

- Implement CARE principles, Indigenous data sovereignty, and culturally safe protocols.
- Establish Indigenous governance subcommittees or oversight mechanisms.
- Align data structures with the Commons' core models where relevant.
- Treat appropriate data sharing as the default, within guardrails determined by Indigenous governance.
- Provide cultural capability training for researchers and users of NRI facilities.

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# 99

Mon, Dec 1, 2025, 05:26 PM Australian Eastern Daylight Time  
[ID: sbm396eb0266116b672c4d40]

Title  
Prof

First Name  
Simone

Last Name  
Warner

Organisation  
Agriculture Victoria Research, Agriculture Victoria, Department of Energy, Environment and Climate Action

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Agriculture Victoria suggests active engagement and support to First Peoples and has done so directly in the development of agriculture strategies, research and innovation, production, and biosecurity emergency preparedness. Agriculture Victoria commits to genuine collaboration with First Peoples to support the delivery of self-determination aspirations in accordance with the Traditional Owner Led Native Food and Botanicals Strategy (TONFABS), and internal Departmental strategies including Pupangarli Marnmarnepu 'Owning our Future' Aboriginal Self-Determination Reform Strategy 2020-2025 and Agriculture Victoria's Aboriginal Self-Determination Implementation Plan 2025-26. Agriculture Victoria considers the roadmap's commitment to cultural protocols and Indigenous data governance aligns with these strategies.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Nil comment

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# 96

Mon, Dec 1, 2025, 01:21 PM Australian Eastern Daylight Time  
[ID: sbm396dcf486622686d9ef7a]

Title  
Prof

First Name  
Ivan

Last Name  
Marusic

Organisation  
The University of Melbourne

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Ensuring that future NRI investments respect cultural protocols, support self-determination and promote benefit-sharing requires embedding Indigenous Data Governance as a core design principle. Governance structures should ideally institutionalise consent, benefit-sharing, and authority to control, supported by ethics frameworks co-designed with Indigenous organisations and embedded across all NRI capabilities engaging with Indigenous data.

Early priorities should include the development of simple, consistent governance structures, standardised data-sharing principles and clear processes that uphold Indigenous data sovereignty while enabling responsible research use. Investments should also support digitisation of language resources and other cultural materials through platforms that provide community-controlled access conditions, reduce repetitive permission requests, and ensure that custodians can update permissions as community circumstances change.

A critical technical requirement is the creation and maintenance of rich, detailed metadata and provenance records. Without sufficient metadata, cultural protocols—such as gender-restricted access, time-based conditions following a person's passing, or community-specific viewing permissions—cannot be reliably applied. Funding and protocols for high-quality metadata must therefore be established as foundational infrastructure so that materials remain usable, appropriately governed and accessible to communities.

Investment in advanced analytics and AI tools developed under Indigenous ethical frameworks is essential. These tools should support language technologies, provenance tracking, and culturally governed algorithmic processes, embedding cultural protocols into

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automation and ensuring technological innovation reinforces Indigenous authority. Strategic partnerships with international research organisations would position Australia as a global leader in ethical AI and culturally governed data science, enabling knowledge exchange and best practice development.

Workforce capability is equally important. Training for both Indigenous and non-Indigenous staff and Indigenous communities must be embedded within NRI programs to ensure cultural safety, confidence in applying protocols, and alignment with established national training materials. Building Indigenous workforce capacity in data management, digital curation and governance should be a sustained priority, supported through dedicated roles, training pathways and leadership opportunities.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Achieving an appropriate balance between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons (ATSIP-RDC) and uplift across discipline- and theme-oriented NRI requires an integrated, mutually reinforcing approach. A dedicated ATSP-RDC should provide the governance architecture, technical foundations, and cultural authority necessary to embed Indigenous Data Governance (IDG) across national research infrastructure. This capability would establish Indigenous-led governance structures, community-controlled hosting, culturally appropriate metadata frameworks, and provisions for knowledge preservation and intergenerational transfer, serving as a foundation for systemic uplift in other NRI domains.

Simultaneously, discipline- and theme-oriented NRI should adopt IDG principles by integrating co-designed ethics frameworks, culturally appropriate data-sharing agreements, and Indigenous representation within governance bodies. Training on ethical practices, community engagement protocols, and metadata standards should be embedded across NRI capabilities to ensure consistent application of cultural protocols. Shared projects, interoperable platforms, and joint funding mechanisms can incentivise collaboration between the dedicated ATSP-RDC and broader NRI, avoiding duplication while strengthening community-led decision-making.

Distributed capability is key: while the dedicated ATSP-RDC provides the anchor for governance and technical infrastructure, discipline-specific NRI assets can contribute scientific expertise, such as advanced analytics, AI tools, and domain-specific data, that are interoperable with community-controlled platforms. Providing tools and platforms that empower local Indigenous communities to govern their data and participate in usage decisions, while minimizing impacts on their time and resources, is essential. Establishing means for collective consultation around place-based research can prevent repetitive permissions being sought from the same communities. One possible option is considering how Aboriginal Collections can be resourced to meet Accredited Data Service Provider (ADSP) accreditation allowing easier flow of data from national data collections to Aboriginal Community sovereign repositories. Ideally such ADSP capabilities would be able to utilise national infrastructure and expertise to minimise Aboriginal-specific costs and avoid duplication.

Workforce development is central to both streams. Comprehensive training for Indigenous and non-Indigenous researchers, alongside pathways for Indigenous leadership, will build

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the skills needed to maintain governance systems, support collaboration, and embed cultural protocols across all NRI capabilities.

By positioning a dedicated ATSIP-RDC as both a sovereign resource and a systemic enabler, and linking it closely with broader NRI platforms, Australia can create an integrated research ecosystem. This approach preserves community autonomy, strengthens Indigenous authority over data, and ensures that capability uplift is distributed, sustainable, and culturally grounded, rather than siloed or symbolic.

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# 95

Mon, Dec 1, 2025, 12:23 PM Australian Eastern Daylight Time  
[ID: sbm396d9ad72f6b34faff4af]

Title  
Mr

First Name  
Anthony

Last Name  
Curro

Organisation  
CRC for Developing NA

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Future NRI investments must embed Indigenous governance and cultural protocols from the outset, with entities that maintain long-term regional presence—such as the CRCNA and emerging CNA, serving as essential delivery partners. Over the next one to two years, NRI design should prioritise co-developed indicators, participation models and consent processes aligned with national data governance frameworks. These should reflect First Nations priorities across 78 percent of northern land and sea Country and ensure culturally informed stewardship within a distributed NRI system.

Over the next three to five years, NRI should support Indigenous-controlled and Indigenous-informed data environments as core infrastructure. The CNA is well positioned to host and strengthen regional capability by ensuring high-quality and culturally governed information flows to First Nations organisations, enabling strong decision-making across economic, environmental and cultural domains.

Over a ten-to-fifteen-year horizon, NRI should invest in place-based learning and observatory functions that track long-term capability, resilience and economic participation across the north. CNA's stable regional mandate enables NRI to treat benefit sharing and self-determination not as compliance components but as measurable outcomes of national research investments.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

A balanced approach positions the Aboriginal and Torres Strait Islander Peoples Research Data Commons as the national standards and governance hub, while distributed regional partners like the CNA operationalise data flows, capability and adoption across northern Australia. The Commons should set shared models, metadata standards and governance

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rules that reflect Indigenous Data Sovereignty and enable consistent national application while avoiding duplication across disciplines.

Discipline and theme-oriented NRI facilities should then interoperate with, and contribute to, this core capability. Alignment can be incentivised through funding criteria, shared metrics and streamlined governance expectations that reward culturally informed implementation.

Within this system, CNA provides a distributed regional node that can broker local data agreements, translate governance frameworks into practice and support community-led stewardship. This hub-and-distributed model delivers national consistency while ensuring genuine regional adoption and culturally grounded implementation.

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# 94

Mon, Dec 1, 2025, 12:19 PM Australian Eastern Daylight Time  
[ID: sbm396d96961c6b43a1e31ed]

Title  
Mr

First Name  
Nick

Last Name  
Jenkins

Organisation  
ARDC

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

I think most researchers and facilities are keenly aware of this and are striving to meet the expectations. Continued support for these efforts is all that is required - preferably over a long than 4 year time scale.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Data commons work best when they are discipline specific. Discipline specific data commons already exist which support indigenous concerns (e.g. PARADISEC, LDaCA, BioCommons, TEDSIC/Gayini etc). Disciplines without indigenous consideration could be targeted as gaps with specific support. A generic Aboriginal and Torres Strait Islander Peoples RDC is unlikely to address the needs of the diverse indigenous research community.

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# 83

Sat, Nov 29, 2025, 06:05 PM Australian Eastern Daylight Time  
[ID: sbm396375f5554afdc3565fc]

Title  
Dr

First Name  
Tom

Last Name  
Honeyman

Organisation  
UNSW, Sydney

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

To ensure future NRI investments respect cultural protocols and support self-determination and benefit sharing, the roadmap should commit to a long-term, multi-decade approach centred on Indigenous-led capability. This includes sustained investment in Indigenous-led data stewardship roles, ongoing funding for community-controlled data hubs, and respectful co-design processes. Governance mechanisms must be determined through broad consultation with Indigenous communities; as a non-Indigenous respondent I'm keen to advocate for Indigenous voices, but not prescribe their form. Operational protocols should be Indigenous-defined, with the NRI's role being to embed, enable and resource these through funding, policy settings and capability uplift, rather than specifying them.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

An appropriate balance requires a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons that functions first and foremost as a protected, community-controlled environment for the stewardship, governance and safe use of Indigenous data, while working in partnership—not hierarchy—with discipline and theme-oriented NRI capabilities. The dedicated capability should anchor national practice by providing leadership and authority, with other NRI capabilities undertaking governance uplift as a priority and embedding Indigenous-defined cultural and data protocols as essential operational elements. Workforce and engagement uplift should be pursued carefully to avoid creating cultural burden or burnout, with co-design guiding what is reasonable and sustainable for communities. Alignment and collaboration should therefore be achieved through partnership mechanisms, co-design, and resourcing rather than mandates,

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ensuring that Indigenous data sovereignty is upheld while enabling each capability to work respectfully and consistently with Indigenous-defined expectations.

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# 73

Fri, Nov 28, 2025, 09:19 AM Australian Eastern Daylight Time  
[ID: sbm395d7e870c5e2bdd154e9]

Title

Other: "Coordinated response"

First Name

International Environment, Reef and Ocean Division

Last Name

DCCEEW

Organisation

DCCEEW - International Environment, Reef and Ocean Division

In what capacity are you responding?

A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

The draft Sustainable Ocean Plan highlights the expanding role of First Nations-led and co-designed marine research. Further targeted investment through NRI will strengthen this work, deepen understanding of Australia's marine environment, and support skills development and knowledge-sharing between First Nations communities and western scientists.

Future NRI investments should ensure appropriate inclusion of the core principles of free, prior and informed consent, respect for Indigenous Ecological Knowledge, data sovereignty and protection of Indigenous Cultural and Intellectual Property. Adoption of these principles is essential to improving First Nations-led research and addressing issues affecting sea Country. Existing models that could be used as an example include AIMS's partnerships with First Nations groups, Parks Australia's Indigenous engagement principles, and the Reef 2050 Traditional Owner Implementation Plan. Ongoing effort is needed to increase awareness of First Nations Knowledge, reduce barriers to participation in marine science, and expand culturally appropriate training pathways, such as the NT's Learning on Country program and tailored higher-education options.

DCCEEW is strongly supportive of the NCRIS proposal from the Integrated Marine Observing System (IMOS) to develop the Coastal Research Infrastructure (CoastRI) project, which among other benefits will provide the opportunity for co-design, partnerships and collaboration with First Nations people on coastal observation.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

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Determining the appropriate balance between these objectives will be dependent on the type of data being considered and should be decided by First Nations people, ideally through formal representative/collaboration mechanisms. For example, the draft Sustainable Ocean Plan supports establishment of a First Nations-led national sea Country representative body to facilitate meaningful First Nations input to national policy development and implementation of sea Country matters. The National Marine Science Committee's 2025 'Black Paper' "Flipping the Tide: A First Nations vision for Indigenous leadership in sustainable ocean culture" also recommends the establishment of two new national bodies: a National Aboriginal and Torres Strait Islander Marine Science Institute with regional hubs; and a National Indigenous Peak Body for Sea Country.

The recently established National Indigenous Environmental Research Network may also provide a good avenue for engagement with First Nations people on NRI investments and appropriate mechanisms for uplifting the collection and sharing of data (and on how to best balance the competing demands of multiple objectives). The 2026 NRI Roadmap should help empower First Nations people to develop and drive investments in NRI that will help meet their aspirations and fulfil cultural obligations to care for sea Country.

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# 72

Thu, Nov 27, 2025, 03:16 PM Australian Eastern Daylight Time  
[ID: sbm39599fa8483e73291aa89]

Title  
Dr

First Name  
Christopher

Last Name  
Adda

Organisation  
La Trobe University

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
The first step would be to operationalise the CARE principles with the introduction of clear national guidelines and processes on how they should be interpreted and implemented. This activity could be undertaken by the ARDC's HASS and Indigenous Research Data Commons or, a dedicated Indigenous Peoples Research Data Commons, and rolled out across the NRI projects over the next 2 years.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Following the establishment of the Indigenous Peoples Research Data Commons, operationalising the FAIR and CARE principles and disseminating the knowledge across the NRI capabilities, the next step could be to establish the equivalent of an Indigenous consumer panel of members with lived experience, where members are invited to work with NRI projects and provide their indigenous knowledge and expertise to help inform the design and execution of projects. This may help to ensure that the FAIR and CARE principles are implemented appropriately for each specific project and bring an interdisciplinary aspect to the project.

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# 71

Thu, Nov 27, 2025, 01:53 PM Australian Eastern Daylight Time  
[ID: sbm3959538c530f3d25ea13e]

Title  
Dr

First Name  
Edoardo

Last Name  
Tescari

Organisation  
Melbourne Data Analytics Platform (MDAP), The University of Melbourne

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
NRI investments should prioritise Indigenous-led governance and data sharing frameworks. Key actions include funding for community-driven initiatives implementing data sovereignty principles reflecting local needs, developing metadata systems that capture provenance with editable access permissions, and providing governance platforms that minimise the burden on Indigenous communities. Investments should support digitisation of language resources and cultural materials through platforms enabling community-controlled conditions, establish collective consultation processes for place-based research to reduce repetitive permission requests, and build Indigenous workforce capabilities in data management. Implementation should involve co-design consultation with planning completed within 18 months, followed by rollout achieving full operational capability within 5 years. This would allow time for meaningful community engagement while maintaining momentum.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Balance should be achieved through investment in dedicated Indigenous infrastructure and uplift across existing NRI. Distributed capability should respect diverse community contexts through local governance while maintaining coordinated standards. Design elements should include Indigenous-led governance structures, community-controlled data hosting, culturally appropriate metadata frameworks, and provisions for knowledge preservation as well as intergenerational transfer. Simultaneously, discipline-/theme-oriented NRI should integrate data sovereignty principles through training on ethical practices, community engagement protocols, co-designed data sharing agreements, and increased Indigenous representation across governance bodies. Funding should incentivise

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collaboration through shared projects and resources. This approach would ensure that Indigenous communities have autonomous infrastructure for self-determination while more broadly embedding cultural protocols across NRI providers.

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# 70

Thu, Nov 27, 2025, 01:36 PM Australian Eastern Daylight Time  
[ID: sbm3959444d1b0ff1507c636]

Title  
Prof

First Name  
Michelle

Last Name  
Arrow

Organisation  
Australian Historical Association

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

We support the proposal from the (IIRC) project, led by Professor Marcia Langton AO FASSA through the HASS & IRDC for a standalone NCRIS capability: "A new National Research Infrastructure (NRI) capability focusing on scaling up the Improving Indigenous Research Capabilities (IIRC) project is critical for recognising, securely storing and effectively and appropriately utilising the wealth of Aboriginal and Torres Strait Islander data for research, policy-making, and cultural preservation ... To support Indigenous data governance, protect cultural heritage, and integrate Indigenous knowledge into research, significant investment in long-term research infrastructure is required. This includes dedicated resources for managing, protecting, and sharing Indigenous data to facilitate large-scale research, policy development, and community-driven initiatives. Such investment is essential to meet growing demands for digital infrastructure, data security, cultural protocols, and supporting Aboriginal and Torres Strait Islander communities to maintain control over their knowledge."

Specifically, we urge the development of:

- Culturally appropriate AI and ML tools developed for automated cataloguing and indexing for audio, video and visual media.
  - Scalable, high-quality remote sensing and geospatial infrastructure (e.g. GIS, satellite imagery, real-time monitoring tools) for environmental management.
  - Integrated, interoperable data systems and data sharing platforms that facilitate the collaborative integration of Indigenous and Western knowledges.
- High-capacity storage systems for audio, video and visual media; secure cloud storage and decentralised data centres to support the protection, ethical management, and responsible use of Indigenous data for research, policy and decision-making.

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

It is critical to ensure Indigenous research infrastructure is realised holistically. Indigenous historical knowledges and ways of being do not readily fit siloed approaches to knowledge where the natural environment, language, history, culture and social wellbeing are treated as distinct objects of knowledge and stored in discrete repositories. Indigenous historical knowledge infrastructure requires the linking and interconnection of galleries, museums, collections, health services, land and water authorities, institutional archives and existing NRI such as the Australian Dictionary of Biography. We urge especially a linking and interconnection with PARADISEC (Pacific languages and Indigenous Australian languages) and LDaCA (Language Data Commons of Australia).

# 67

Wed, Nov 26, 2025, 04:23 PM Australian Eastern Daylight Time  
[ID: sbm3954b6d2071a5dbc40149]

Title  
Prof

First Name  
Kim

Last Name  
Wilkins

Organisation  
Faculty of HASS, University of Queensland

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Core principles for action:

1. Redesign core frameworks, don't add Indigenous requirements - Infrastructure should be built with Indigenous data sovereignty as foundational principle, not retrofitted with Indigenous add-ons
2. Recognise Indigenous communities as knowledge holders and leaders - Not as subjects requiring 'capacity building' or 'development'
3. End blanket 'high risk' categorisation - Not all Indigenous research warrants maximum scrutiny; differentiated approaches needed
4. Accommodate Indigenous epistemologies - Infrastructure must support Indigenous understanding of Country as active entity with agency, and relationships with land, water, and other-than-human beings
5. Evaluate protective measures - Ensure 'protections' serve Indigenous interests rather than creating barriers to Indigenous-led research

Timeframe:

Year 1: - Establish dedicated capability with binding authority over Indigenous data governance standards - Mandate Indigenous governance at decision-making level for all relevant infrastructure - End automatic 'high risk' classification for Indigenous research - Embed CARE principles alongside FAIR as baseline requirement

Years 2-3: - Redesign infrastructure with Indigenous data sovereignty as foundational principle - Build technical systems supporting Indigenous epistemologies - Implement accountability mechanisms

Success measure: Indigenous researchers find infrastructure naturally responsive without constant negotiation

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Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Answer: Australia needs both, but with clear authority structures.

Why both are necessary:

- Indigenous knowledge intersects with every research domain (environment, health, language, social systems) - requiring distributed capability
- Indigenous priorities need independent infrastructure serving their interests - requiring dedicated capability
- Siloing Indigenous research reproduces problems; so does making it a tick-box add-on

The dedicated capability should have:

- Binding authority to set standards for Indigenous data governance across all infrastructure
- Decision-making power in approving developments affecting Indigenous data
  
- Resource allocation authority to direct investment toward infrastructure demonstrating genuine Indigenous governance
- Independent funding not dependent on other infrastructure priorities
- Active research capability serving Indigenous priorities

Distributed capability must mean structural change:

- Infrastructure rebuilt with Indigenous data sovereignty as foundational principle (not adapted with add-ons)
- Indigenous governance at decision-making level as baseline requirement
- Default operating procedures assume Indigenous governance; exceptions require justification
- Accountability to Indigenous authority on how well infrastructure serves Indigenous interests

The relationship:

The dedicated capability sets binding standards; discipline-oriented infrastructure operates within those standards and demonstrates accountability to Indigenous authority. This ensures Indigenous knowledge systems shape what's considered normal in research infrastructure, rather than perpetually negotiating accommodation.

# 65

Wed, Nov 26, 2025, 10:13 AM Australian Eastern Daylight Time  
[ID: sbm395363c07d9c3527e7099]

Title  
Prof

First Name  
Kathryn

Last Name  
McGrath

Organisation  
The University of Technology Sydney

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Institutions such as universities are best served through dedicated resourcing and development of maturity models for Indigenous Data Sovereignty and Stewardship, which require significant resources and planning. The scope of maturity models can differ due to factors including Indigenous leadership and institutional expertise, technical capacity uplift and strategic alignment with university priorities, resourcing, and allocation of workload across complex teams and workflows.  
However, all maturity models developed by universities and the NRI should include the factors and considerations listed below.

#### Respecting cultural protocols

The NRI should recognise, amplify and action key existing and applicable protocols, principles, policies and frameworks such as AIATSIS Code, CARE principles, Indigenous Cultural and Intellectual Property rights and Maïam nayri Wingara principles, Indigenous Data Sovereignty and Stewardship principles and UNDRIP. The NRI should also ensure that culturally appropriate data repositories implement FAIR and CARE principles, and that they require Indigenous community-controlled access systems, metadata for Indigenous rights and protocols, data integration capabilities that maintain community control, and long-term preservation infrastructure.

#### Supporting Self-Determination

The NRI and participating universities should support Indigenous Self Determination through dedicated policy, strategy and planning. The NRI should encourage Indigenous leadership, governance and partnerships to drive the exercising of self-determination through a rights driven agenda and in support of the aspirations and priorities of partner practitioners, communities, organisations, clans, tribes and nations. Lastly, data

infrastructures should provide support for, and operationalisation of existing research/university agreements with Indigenous peoples and communities, enabling diverse governance arrangements, consent mechanisms and Indigenous Data Governance arrangements.

#### Promote benefit sharing

Benefit sharing is embedded in a range of Indigenous research approaches and processes such as ethics and agreement making. Improving and adapting existing benefit sharing processes in the context of NRI requires a concerted mapping and identifying of new data management challenges and risks in order to shape up future proof solutions.

Benefit sharing requires investment in infrastructure for the appropriate handling of Indigenous research data, including support for Indigenous communities to have access, ownership and control of data on Country. A priority focus area for benefit sharing is the need for more effective resourced solutions that enhance self-determined Indigenous community data related capabilities.

#### Long-term protection of Indigenous data

Legislative reform is vital to ensure the long-term protection of Indigenous data.

Agreement making principles consistent with the Framework for Governance of Indigenous Data need to be embedded across the life-cycle of data management, including practices for data disposal or long-term preservation. Key legislation including the Federal Archives Act (1983) requires reform to protect Indigenous rights in data.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

There should be a blend of both a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability and overarching uplift across disciplines. This allows for growth and support for specialised expertise and responses to complex issues, as well as creating a broader cultural shift across the Australian research sector.

Development of a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons will assist with the scope and implementation of national commitments for greater Indigenous data governance measures such as those found in the National Agreement on Closing the Gap.

A partnered model for a Research Data Commons could involve key universities for greater success in high impact areas. Universities are implementing best practices in knowledge sharing and Indigenous governance and as such have established trusted partnerships to grow and elevate principles and practices of Indigenous Data Sovereignty in various industry and community contexts.

Provision of uplift in capability across relevant discipline and theme-oriented NRI could be achieved via several strategic projects including but not limited to:

- Unique investment for enhancing capability to progress Indigenous Science solutions in key disciplinary areas and government funding regimes, see Prof Brad Moggridge' NRI survey submission 244.
- Support for Indigenous-led community partnered pilot projects that accommodate user testing of data infrastructure and allow for quick response lessons for broader implementation at a community level.

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- University audits to identify at-risk Indigenous data collections, particularly nationally significant research collections not currently supported by university or institutional repositories and vulnerable to loss, and provide necessary support for their preservation.
- Practical implementation of ICIP through a right driven approach is an essential component for the protection of Indigenous knowledge.
- Acknowledgment of, and support for, university libraries and key specialist data teams who are valuable and practical resource hubs for building capability and educational experiences for key stakeholders.
- Utilisation of tools for the curation and care of Indigenous data collections (see for example the Mukurtu Content Management, Local Contexts project, ATSIILIRN Protocols for Libraries, Archives and Information Services).
- Investment in training for Indigenous data and information workers to build support for implementation of tools, particularly within university libraries.

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Tue, Nov 25, 2025, 04:43 PM Australian Eastern Daylight Time  
[ID: sbm394fa29c4fab33225d50]

Title  
Dr

First Name  
Trevor

Last Name  
Steward

Organisation  
University of Melbourne

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

Using 7T neuroimaging to study mental health, neurodiversity and development is essential because it allows precise characterisation of the brain circuits that are directly implicated in inequitable mental health outcomes, including for Aboriginal and Torres Strait Islander peoples. To ensure such NRI investments align with the Framework for Governance of Indigenous Data, all new 7T platforms and projects should include culturally grounded consent, data governance, and benefit-sharing agreements in their design.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

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**# 59**

Tue, Nov 25, 2025, 12:01 AM Australian Eastern Daylight Time  
[ID: sbm394bf4e5ecb79b1d7cde6]

Title  
Prof

First Name  
Aidan

Last Name  
Sims

Organisation  
University of New South Wales

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
This is a question that should be put to Aboriginal and Torres Strait Islander researchers and communities.

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# 58

Mon, Nov 24, 2025, 11:40 PM Australian Eastern Daylight Time  
[ID: sbm394bf9f867cafe81b2390]

Title  
A/Prof

First Name  
Brailey

Last Name  
Sims

Organisation  
University of Newcastle

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
**Respect for cultural norms and dissemination of benefits must be an expedited high priority.**

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
**Balance is important, but I have no suggestion how it might be facilitated.**

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# 53

Mon, Nov 24, 2025, 01:28 PM Australian Eastern Daylight Time  
[ID: sbm3949c9d9c4fb4628ece6c]

Title  
Dr

First Name  
Thomas

Last Name  
Quella

Organisation  
The University of Melbourne

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Not applicable for my submission

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Not applicable for my submission

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**# 19**

Sat, Nov 15, 2025, 07:37 PM Australian Eastern Daylight Time  
[ID: sbm391cc284bd9ddfa59de22]

Title  
Prof

First Name  
Cheryl

Last Name  
Praeger

Organisation  
University of Western Australia

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
I am not indigenous, but I am sure that whatever is done must have the indigenous community involved at every stage.

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# 16

Tue, Nov 11, 2025, 09:26 PM Australian Eastern Daylight Time  
[ID: sbm39088c650c75a7ff001fa]

Title  
Prof

First Name  
Andy

Last Name  
Hogg

Organisation  
ACCESS-NRI

In what capacity are you responding?  
A representative of an organisation or group

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
Indigenous data is a portfolio-wide responsibility, and creation of a single RDC for indigenous data would lack the domain-specific information required for implementation. We therefore argue that this uplift should occur broadly.

All Projects should have capability in indigenous data governance, both at the operational level and through selection of Board members. ACCESS-NRI has an indigenous independent Board member, and advocates that skills and knowledge in this area should be part of the skills matrix to ensure diversity in Board capability.

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# 11

Thu, Nov 6, 2025, 10:50 AM Australian Eastern Daylight Time  
[ID: sbm38ec860c09acc44860c56]

Title  
Dr

First Name  
Mitra

Last Name  
Jazayeri

Organisation  
La Trobe University

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?

To ensure future NRI investments uphold cultural protocols, self-determination, and benefit sharing, the 2026 NRI Roadmap should embed Aboriginal and Torres Strait Islander governance and leadership as core principles across all stages of design, investment, and operation. Respecting Indigenous data governance is not a one-off activity but a structural commitment that requires clear timeframes and accountability.

Medium term (3-5 years):

- Co-design and implement a national Aboriginal and Torres Strait Islander Peoples Research Data Commons, governed by Indigenous-led institutions and aligned with the Australian Government's Framework for Governance of Indigenous Data.
- Develop funding and partnership models that incentivise collaboration between NRI providers and Indigenous communities.
- Embed Indigenous leadership positions within NRI programs to ensure continuous representation in decision-making and research translation.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Achieving an appropriate balance requires a hybrid, systems-first approach: invest in a dedicated, Indigenous-led Research Data Commons (the "Commons") as a national leadership, governance, and interoperability hub – while concurrently funding targeted uplift across discipline and theme-oriented NRIs so those systems can operate in alignment with the Commons' governance, technical standards and cultural protocols.

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Fund a dedicated Indigenous-led Research Data Commons as the national governance and interoperability hub while simultaneously investing targeted uplift across discipline NRIs — using co-design, binding standards (FAIR+CARE), conditional funding, and measurable performance incentives to ensure alignment, Indigenous leadership and community benefit.

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# 9

Thu, Nov 6, 2025, 08:06 AM Australian Eastern Daylight Time  
[ID: sbm38ebf07751ca113f4acc5]

Title  
Mr

First Name  
Stuart

Last Name  
Milburn

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
Consultation with local groups where possible. Support cooperation with Aboriginal rangers.

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# 6

Tue, Nov 4, 2025, 05:37 PM Australian Eastern Daylight Time  
[ID: sbm38e3aeb8c4ac65ee79940]

Title  
Prof

First Name  
Sach

Last Name  
Jayasinghe

Organisation  
QCIF Digital Research

In what capacity are you responding?  
A representative of an organisation or group

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
An immediate need is dedicated, fit-for-purpose infrastructure that addresses FAIR, CARE and First Nations sovereignty requirements. There are already good building blocks, but there needs to be coordinated co-design with First Nations people in developing and deploying national research infrastructure and the NRIs have a big role to play here. For example, self-determination requires deployment of secure data enclaves that allow for controlled and pre-approved access to data assets. Before granting access authentication requires unique attributions (language, tribe, etc) for identity (what would be the attributions that AAF may introduce here, for example). How would Indigenous Rangers capture and upload data assets into such repository - mobile connectivity is not normally considered priority in our current NRI ecosystem, for example.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?  
As an organisation, QCIF has had several touch points in relation to First Nations data and digital initiatives. Whilst we are able to deliver on technology outputs, we have struggled with co-design and how, when and whom to engage to genuine co-design approaches, often seeing disparate and siloed efforts when seeking collaborators. As such, we would encourage investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability which would anchor the national efforts without hampering the passionate efforts across the disciplines and NRIs. The dedicated RDC can be the source of information and knowledge diffusion to create efficiencies and effectiveness in the eco-system and be the beacon for coordinated NRI efforts towards closing the Gap.

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There should be a two-stream approach that leads to establishing a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability AND integration of Aboriginal and Torres Strait Islander and Western knowledges across existing/new NRI capabilities and associated expertise clusters such as research hubs and centres.

I would propose that these happen in parallel - signifying the importance of Aboriginal and Torres Strait Islander knowledge systems to Australia's research and innovation agenda.

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?

Whether the dedicated capability or uplift in capability is sought - both require oversight from a committee. This committee will determine incentives for current NRI providers to uplift capability from which the Research Data Commons could be born (that is also integrated with all existing NRI providers). This is one approach that moves away from the perceived dichotomy of one or the other, and seeks to find a way to integrate both. This integration is essential for longevity of the approach and a legacy to emerge.

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# 3

Fri, Oct 31, 2025, 01:42 PM Australian Eastern Daylight Time  
[ID: sbm38ce3d6100f8d3b86cdcc]

Title  
A/Prof

First Name  
Vera

Last Name  
Roshchina

Organisation  
UNSW Sydney

In what capacity are you responding?  
An individual

Q2. What should be done, and over what timeframe, to ensure future NRI investments respect cultural protocols, and support self-determination and promote benefit sharing, in line with the Australian Government's Framework for Governance of Indigenous Data?  
**The money should go to the indigenous people and organisations, not used by privileged non-indigenous people to pay lip service to the issues and do little of substance.**

Q3. How might an appropriate balance be achieved between investment in a dedicated Aboriginal and Torres Strait Islander Peoples Research Data Commons capability, and provision of uplift in capability across relevant discipline and theme-oriented NRI?