

7. Are there Structural Barriers to Whole-of-Government?

Professor Ian Marsh

Is it possible to design effective whole-of-government arrangements within present meta-structural constraints? The latter has become the primary framework within which indigenous policy development and service delivery has been orchestrated. From the outset, the profound challenge that this would pose to governance was recognised. Two MAC reports (2004, 2007) described the changes in organisation and processes that were essential if whole-of-government was to work.

This included five basic imperatives:

- substantial initial cross-agency/stakeholder agreement about the broad purposes to be pursued;
- use of the outcomes budget framework to pool resources and to create appropriate accountability frameworks;
- lead-agency staff empowered with sufficient authority to manage whole-of-government settings and to lead the engagement of local stakeholders,
- empowering these same managers to engage with relevant individuals and interests;
- And finally ensure the individuals engaged in these latter roles have the appropriate networking, collaboration and entrepreneurial skills.

These are very demanding requirements. Can the development of localised authority and localised discretions be reconciled with central determination of outcomes and central budgeting and accountability arrangements? Or are devolved, whole-of-government outcomes not possible without much more radically decentralised designs?

What programs are involved? To grasp the whole-of-government challenge, a first step involves assessment of the multitude and variety of programs that ICCs are supposed to broker into local communities. In practice, they can do this by one of two means: either by brokering linkages between communities and programs; or, more demanding, by joining individual programs into a funding block funding. By either means, ICCs are expected to achieve greater program impacts in a specific local context.

The Strategic Evaluation of Indigenous Programs (Department of Finance, 2010) offers the most recent comprehensive overview. It identified no less than 232 individual programs which in one way or another support Indigenous Australians. This report reviews these programs in the context of the various broad outcomes that the government has established.

An earlier ANAO report (2007) focused on the four primary departments - DES, DEWR, FaHCSIA, and Health. This report identifies 94 programmes, either mainstream or niche, that are relevant to Indigenous affairs. DES operates 15 Indigenous specific programs and 43 mainstream programs that have Indigenous applications; DEWR 11 indigenous specific programs and the Job Network; FaHCSIA, 6 Indigenous specific and 6 mainstream programs; Health and Aging, 5 Indigenous specific programs and 9 mainstream programs. To add to the complexity, many of these major programs have sub components.

In a report on the indigenous trials, Gray (2006) noted the challenge of program management as perceived on-the-ground, in this particular case from Wadeye. The trial was intended to reduce the number of individual programs that local communities need to manage. In fact in the course of the trial the number of programs applied to the community increased to 90. In another example, Dillon and Westbury list the five Commonwealth programs that could be tapped to fund natural resource management on indigenous land: 'An important and growing policy area where in recent years scores of Indigenous ranger programs have emerged across northern Australia focused on land and resource management. Program funding in this area comes from a diverse array of agencies: the National Heritage Trust, the Indigenous Protected Areas Program, CDEP, STEP and the ABA. ...Programs vary in size from hundreds of millions (for example the CDEP or ARHP) to less than half a million (for example the Indigenous Children's Program). (p 66)

With 39% of the indigenous population under 15, education is another critical area. The same authors note the array of programs relevant here: 'The national flagship programs include the Youth Allowance and Abstudy: the former is targeted at young people studying, undertaking training for Australian apprenticeship, looking for work, or sick; the latter at indigenous students. Over and above this FaHCSIA has four 'niche' programs which provide youth services of various kinds with a total national budget of \$34.6 million and a client base of approximately 340 000 nationally. DEST has at least ten youth related Indigenous specific niche programs....the data on numbers of service providers suggests that the availability of these programs in remote Australia is very patchy...It is clear that across the national government there are a couple of hundred different programs potentially allocable to the circumstances of remote citizens. Access is a different matter entirely' (p. 67/68)

Finally, they note the bewildering array of programmes aimed at indigenous housing: 'The existence of concurrent state and national responsibilities means that in some areas programs are duplicated by each jurisdiction. Housing is a classic example where states, territories and national governments deliver both mainstream and Indigenous housing and housing related programs, and even within the national government there are a number of separate Indigenous housing programs (CHIP/NAHS, CHIP/AACAP, FHBH) all delivering housing and essential services at the community level, along with ARHP which funds the states and territories to deliver housing at the community level' (p. 65).

The whole-of-government architecture was designed to ensure these programs are accessed by the citizens that they are intended to serve. How effective have these arrangements proven to be?

Whole-of-government administrative architecture: Since whole-of-government arrangements were introduced in 2002, there have been at least nine reviews. The first four covered the initial COAG trials and the rest subsequent developments. Seven were official or commissioned evaluations and the remainder independent academic assessments: Urbis, Keys, Young, 2006; Morgan Disney, 2006; Gray and Sanders, 2006; Gray, 2006; ANAO, 2007; KPMG 2007; Hunt, 2007; FaHCSIA, 2007; O’Flynn and Blackman, 2010). All these reviews repeat points stressed in the MAC documents, namely that whole-of-government will not work without devolution of authority, funding, accountability and coordinated organisation. They also all find continuing and unresolved administrative difficulties. It has not proved possible to reconcile centralised ‘siloes’ organisation and funding with devolved authority and flexible resource management.

As an introduction to these unresolved problems, consider the case of Mutitjulu, ironically the first community named in the NTER. Before whole-of-government was conceived, this community tried, over more than a decade, to obtain for itself a new style of governance (Smith, 2009). Its efforts foundered on immovable central structures. This story starts in 1991 when the NPY Women’s Council prepared a report highlighting concerns about ‘controlling and caring for children’. A series of submissions and discussions followed. In 2000 the community council at Mutitjulu asked Centrelink, ATSIIC and FaCS to work with it to develop a practical strategy to deal with welfare dependency and related family problems. Following a consultation, the Community Council itself proposed a Participation and Partnership Agreement. The departments did not respond. Why? ‘First, the key departments would not support an “All in” community model of welfare reform and would not support linking Youth Allowance with school attendance, even though these had been specifically requested by community members...Second, Centrelink and FACS would not countenance an indigenous community working with them to develop and implement locally-relevant breaching rules. Neither would they countenance a community organisation being provided with a delegation under the Social Security Act in order to do so...Third, entrenched inter-departmental turf wars in Canberra meant that the departments concerned were unable to negotiate a common position...And finally the Australian government was unable or unwilling to reform the chaotic state of its departmental program funding in order to streamline the pooled funding and grant reporting arrangements that would have been required...In late June 2007, the Australian government announced that Mutitjulu would be the first community into which it activates national emergency measures. It will do so unilaterally’. So far as coordination is concerned, we will see little has changed.

The findings of the various evaluations affirm that whole-of-government is confounded at the critical regional and ICC levels. The obstacles are structural not contingent. Consider the two most recent reports, one official (2008, conducted by KPMG) and the other independent (2010, conducted by academics from the ANU and the University of Canberra). The KPMG study involved a review of internal documents plus interviews with 158 Australian and state government agency staff and 35 community organisations. The following selected observations define the magnitude of the structural barriers that continue to frustrate this arrangement despite six years experience and at least eight preceding reviews:

‘There is a definite trend of line agency staff presenting to communities/organisations as representative of their agency.....Communities/organisations reported this as confusing as they do not know who to talk to or if they have to talk to all the different agencies instead of accessing services through the ICC....ICC staff and line agency staff rarely visit communities together’

‘Many line agency staff were unable to provide governance and financial management assistance to organisations due to probity issues relating to assessment of funding applications...Communities advised that it was difficult for them to keep abreast of the changing policy and service delivery environment’

‘ICC managers reported frustration in undertaking (their intended leadership) role. As coordinators, Managers indicated that they do not have authority to gather agency staff support....Line agencies confirmed that their staff are directly responsible to their line agency and that the ICC manager has no authority to compel or direct staff to undertake ICC work.

‘Line agency staff located in ICCs commented that they experienced a tension between their program management responsibilities (i.e. the expectations of their line agency) and their responsibility to engage in what they referred to as ICC work....Conversely ICC managers reported feeling powerless in some situations as they do not have the authority to direct change.’ (p. 9)

‘The implementation of whole-of-government collaboration in ICCs is an area requiring significant improvements. Many of the issues that impede whole-of-government are structure and have little to do with ICC staff and management’s willingness to collaborate’ (p. 10)

‘Overwhelmingly the consultation repeated the message that the current funding and reporting arrangements are a significant barrier to whole-of-government collaboration...Line agencies have different program guidelines, funding rounds and delegation which do not align...Complaints were raised about the different risk assessments each line agency applies..in some cases this can result in applications undergoing up to 8 different risk assessments’

‘One ICC took over 12 months to negotiate and approve an SRA which was worth under \$50 000 in funding...To overcome the barrier of obtaining multiple line agency approvals...many ICCs have adopted the approach of developing smaller SRAs in terms of dollar value, number of signatures and issues to be addressed’

‘A perceived barrier to reducing red tape is line agencies different program and funding guidelines....For example one agency may apply more rigorous risk assessment for applications over \$100 000, while another agency’s more rigorous assessment only applies to applications over \$150 000.’

The findings of the University-based study (O’Flynn and Blackman, 2010) echo these conclusions albeit in more graphic terms. This study was based on 48 field interviews covering staff at ICCs, State and regional offices and in Canberra. It suggests that despite the top-down whole-of-government effort, Mutitjulu’s experience has not been

transcended. Their conclusion is unequivocal: 'Due to entrenched barriers, which permeate the broader public service, ICCs have been a failed experiment.'

Like KPMG, O'Flynn and Blackman identify structural failings in the basic organisational design:

- No or limited assignment of authority to the Indigenous Coordination Centre Managers,
- An ad hoc approach to the representation of departments (which meant staff were withdrawn as cost pressures emerged);
- An underinvestment in skills;
- Inconsistent operating systems.

They cite the comments of ICC managers, first on their delegations of authority:

I could not go out and direct another person to do something in this ICC ... because they're not from my agency. I could (only) ask, influence, beg (Executive Level, ICC).

Whole of government doesn't work ... when you've got all different agencies sitting in the one place, supposedly working together ... they're supposed to be all collaborating and telling each other what they're doing ... I'm telling you it doesn't work and I work in an ICC and I've been there since the day it started (Executive Level, ICC).

The fact that we're co-located with [Department A] and [Department B] and a couple of [Department C's] people is just window dressing. So there's no whole of government activity between them ... There's no practical program [or] whole of government approach (APS Level, ICC).

The NTER Review also picked up these criticisms but this time from the perspective of the clients: 'There as extensive comment in communities about the lack of co-ordination across locally based professional staff. Between the GBMs, Community Employment Brokers and shire service managers, there is not a clear point of authority or coordination'

A second set of unresolved governance issues arose from conflicting vertical and horizontal tensions which cut across in the administration of programs: According to O'Flynn and Blackman: 'The pervasiveness of a program focus and the silos that it creates were seen as impossible to combat even in a setting where there was physical co-location and strong endorsement from Ministers and Secretaries.' The comments of ICC staff provide graphic confirmation:

There's all these horrendous issues [in] the way we structure and design ... we're all in-house, independent silos that are not meant to really do anything more than service that particular program (Executive Level, ICC).

It seems to me the whole of government approach is about being entrepreneurial inside the public service ... [For] program managers and project managers it's not quite like that ... [they] are constrained within the approaches and silos (Senior Executive Service, ICC).

When you go from the top down to the bottom [WG] disconnects at multiple levels. It disconnects through the allocation of finances, it disconnects through the rewards for your accountabilities for your program ... so all those things work against it (Senior Executive Service, National Office).

A third problematic element involved centralised decision-making. This aspiration also fell foul of more embedded administrative practices and requirements:

The idea [was] for ICCs to have a pool of money that they could make decisions about. Well, in the great thing about being risk averse that was all centralised back in Canberra: ... useless basically. It just went against the whole thing about whole of government which is about sharing, devolving, not controlling everything, but taking responsibility and it's the same pattern. And that was a bit of its undoing, in fact because it was to give people the power to do the deal on the ground (Senior Executive Service, ICC).

There's systematic and the structural problems that everyone faces ... around the funding agreements ... really inhibiting for anyone ... and that certainly has happened [on] numerous occasions where ... people have been able to say, "well I think we can do that" and ... then going away and finding the actual delegate says, "no" ... and yet you've said, "yes" ... the people that are actually there [in ICCs] don't have ... the ability to be able to make a call that can be carried through ... (Executive Level, National Office).

[In the past] you'd have a cup of tea and even if you said "no" [community members] appreciated it. Whereas now, God, they're too scared to pick up the phone. They just feel the concept of the decisions and the power over their life is just so far removed ... a lot of the funding has been removed back to [the capital] ... [and] not only the position but the decision making [power] (Executive Level, ICC).

You cannot make a decision ... You can agree and say "we'll take it up the line" but that doesn't mean squat to me ... a lot of the poor old officers who go out there every two weeks, collect notes, build relationships, but in reality it's a very long and tortuous process ... (Executive Level, National Office).

Most recently, under the 2009 *National Partnership Agreements* between the Commonwealth and the States, the same broad arrangements have been extended to coordinate the delivery of programs across jurisdictions. Six agreements have already been signed and others are foreshadowed in relation to native title claims arrangements, remote infrastructure and healthy food. In general, the parties also commit to 'developing a co-ordinated approach' and 'enabling initiatives to be delivered in a manner appropriate to needs in particular locations'. To oversee the arrangements, a Coordinator-General based in Canberra was appointed in 2009. This officer would 'have the authority to work across agencies to cut through bureaucratic blockages and red tape...the Coordinator – General will have direct relationship with Commonwealth Secretaries ...and will work collaboratively with State and Territory officials and Ministers to achieve a unified approach'. This approach replicates on a national scale, the Commonwealth governments own whole-of-government arrangements. The ANAO report discussed earlier identified

some 95 relevant programs in four departments that were potentially relevant to ICC operations. Many sub-divided into a variety of further streams. How many more might be added when the diverse array of state programs are included? In the light of the experience with ICCs, it is hard to be sanguine about the likely success of this exercise in federal-state collaboration.

Accountabilities as a structural barrier to local effectiveness: Central accountability requirements create another barrier to on-the-ground effectiveness. Take health services. In the interests of enhancing local choice and control, the Aboriginal Community Controlled Health Services (ACCHS) were established in the 1980s. Funding was later transferred to ATSIC and grants were on a yearly basis but with an expectation of continuance. The Commonwealth Department of Health assumed responsibility in 1995 and thereafter funding increased. The pattern of funding has since further evolved with most services now drawing support from several sources: a core operating grant from the Office for Aboriginal and Torres Strait Islander Health (OATSIH); state government Health Department grants; and finally by proposal driven niche funding that could include broader social purposes.

Each funding source adopts its own application process, accountability framework and priorities. In an assessment of these arrangements, Lavoie et al (2009) note: 'Analyses conducted by the Victorian Department of Health suggests that the reporting and compliance burden is disproportionate compared to that imposed on other small and medium-size funded agencies' (p. 6). For example, aboriginal agencies receiving on average \$2 million were accountable for between 26-30 activities. NGOs typically received total funding of \$10 million for the same array of activities. This study also found that agencies can be required to produce up to 59 separate reports for 13 programmes. This boosts transaction costs disproportionately. Further, in a small service disentangling the daily time allocation of a single staff member between varieties of programmes can be wholly artificial. Finally, a 12 month funding cycle makes the recruitment of staff precarious.

These multiple accountabilities and the associated burden of transaction costs have persisted despite having figured so strongly in other evaluations. This suggests that the requirements derive from wider structural imperatives and cannot be excised without systemic change.

Consultation and the development of social capital. Every official report since 2001 has emphasised the imperative of working with and through local communities (e.g. Commonwealth Grants Commission, 2001; ATSIC, 2003; Whole-of-Government 2004; Morgan Disney 2006; wicked problems, 2007, NTER Review 2009; Devolved Government 2009; Department of Finance, 2010; Productivity Commission, 2011). To illustrate the complexities that can arise, Edmunds (2010, p. 16) cites the negotiations over James Price Point, which involved Woodside and a proposed LNG development. Negotiations were conducted with the Kimberley Land Council, the organisation which had statutory responsibilities for consultation under the Native Title Act. The Council had secured a consensus amongst key traditional owners. But a dissident group challenged these processes. Edmunds comments: 'This is a common situation and one that traditional law

could once have dealt with. However, it fits uneasily into contemporary decision making, raising a crucial question about how much, and whose consent is needed for informed consent.

If this is one dimension of the issue, another is the quixotic (from the perspective of local communities) behaviour of their governmental interlocutors. Take the NTER. This banned sales of alcohol on Aboriginal land. According to Maggie Brady, a specialist in alcohol use in Indigenous communities: 'The (political grandstanding associated with the NTER) was a little strange considering that most Aboriginal land in the Territory was already dry. There were already 107 general restricted areas, all on Aboriginal land and all in non-urban areas except for one town camp in Alice Springs.....the alcohol recommendations in the *Little Children are Sacred* report...are designed to work with and enhance the NTs existing legislative structure and that the Intervention measures unhelpfully cut across them' (2007, cited Edmunds, p. 19).

Another example involved the impact of the NTER at Wadeye, an early trial site. 'When a crisis erupted at the Wadeye trial site.....the Commonwealth government resorted to a more coercive approach characteristic of hierarchical or contract government...It has chosen not to develop housing through the legitimately elected Thamururr Regional Council, with whom it signed the COAG trial agreement thereby by-passing and potentially undermining the very indigenous governance structure it partnered with only four years ago, and to which it remains formally committed in the NT bilateral agreement (Gibbons evidence to Senate Estimates Committee Hearing, 2007, cited in Hunt 2007, p. 167).

Smith (2007) describes the proposed governance arrangements for the West Arnhem Shire that were developed slowly and after protracted negotiations that had begun in 2004. Their purpose was to plan implementation of a new local government shire covering the entire region. Following protracted on-the-ground negotiations over three years which progressively built support amongst relevant groups and communities, a new governance structure had been settled. In 2007, the Intervention unceremoniously aborted these arrangements, leaving behind a frustrated and cynical local community.

According to the ANAO, in 2007 75% of 257 managers surveyed in the ANAO Audit responded positively to the statement 'The Indigenous Affairs Arrangements (IAAs) have encouraged consultation with indigenous communities at the local and regional levels'. How effective were these conversations from the perspective of their interlocutors. The on-the-ground evidence is not positive. For example, in May 2010, DEEWR and FaHCSIA issued a draft indigenous economic strategy. Submissions were invited and consultations held with indigenous communities throughout Australia. The following are the reporter's notes on the consultations held in various remote centres in November 2010:

In Alice Springs: 'Approximately 22 (Indigenous) participants attended the workshop...People participated in both the questions and answer session and the table discussions but there was widespread criticism of the relevance of the Indigenous Economic Development Strategy to remote areas and the likelihood of anything changing on the ground.....There are no economic foundations in remote communities and this

needs to be acknowledged..There was widespread criticism that the strategy was homogenising and represented an urban western model...(it) needs to respond to the different circumstances, opportunities, economies and drivers in remote regional areas..There are so many economic strategies around that people are blasé about “just another plan”..The gap between the strategy and what is happening on the ground is very wide..There is a different sort of economy operating in remote areas. It’s not just a matter of transferring these into real jobs, they are real jobs but not recognised as such.’

In Broome: ‘ Indigenous people need to be heard..this has not happened in the past and this is being repeated in the current process: not enough time....and doubt as to whether the draft strategy will properly take account of the feedback..The current ranger program should be expanded. It has been successful in raising confidence and helping people become work ready.’

In Cairns: ‘Many participants said that over the decades they had participated in similar discussions with Government and had raised the same issues....There was obvious frustration with the focus of this consultation...the Mayor of Yarrabah led a symbolic walkout at 2pm underlying the level of frustration at the meeting...The strategy was seen as meaningless without a means of implementing it through planning at the community level and there was scepticism that anything would change on the ground..There is a need to open up communication between government departments.’

In Port Lincoln: ‘There was a high level of scepticism regarding the draft Strategy as participants note that consecutive governments had consulted on similar policies in the past without any noticeable achievements to date...Government (should) be held accountable for not following through its own recommendations in the area of indigenous economic development in the past ..The one-size-fits-all approach is inappropriate – there is a need for regional level planning including local employers and business. Local communities both indigenous and non-indigenous need to work together to achieve solution’

‘ In Karratha: ‘Real engagement means listening to indigenous people and not just telling them...it is difficult to engage with government.....previous feedback for policy development over the years has been ignored. There is no apparent correlation between what the Australian government proposes and what indigenous people want. A place-based approach is needed. Different communities have different needs and opportunities’

The funding framework: At a material level, W H Stanner’s indictment of the ‘great Australian silence’ about Indigenous Australians is reflected in an accumulation of deficits which dog present programs: ‘The list would include in no particular order, the pre-existing failure of educational outcomes, which lead to a largely non-literate indigenous citizenry, extreme housing shortages for personnel required to deliver government funded programmes and service across remote Australia; poor law enforcement and less than optimal levels of intellectual capital within government agencies relevant to remote service delivery.....The combined absence of social and physical infrastructure means that there is nothing for governments to graft mainstream services onto as happens elsewhere. Government appear to discount or underestimate the

importance of a pre-existing network of social, physical governance and business infrastructure...(Dillon and Westbury. p. 59).

One important source of equality in services for Australians is the periodic determinations of the Commonwealth Grants Commission (CGC). Via complex metrics, the CGC attempts to equalise funding for service provision around Australia. But there are several problems. First, determinations are based on average or mainstream needs. There are no special provisions or allowances for remedying acute backlogs such as those that exist in remote Australia. These were comprehensively documented by the CGC in its 2001 report (cited previously).

Second, while the Commission grants money on the basis of an assessment of needs in particular areas like housing, transport etc, there is no requirement for governments to spend their allocations in these areas. On the contrary. The States and Territories are free to spend the sums as they choose. On the contrary, the Commonwealth has 'defended the practice of making untied general purpose grants to (the states and local government) in recognition of their status as independent-elected democratic spheres of government. The fact that allocation of these grants was determined through an exercise which made reference to Aborigines in the measurement of disability factors in order to achieve some degree of fiscal equalisation....was clearly regarded as of secondary importance to the principle of general purpose funding' (Sanders, quoted Rowse, 2002). In addition, the Commonwealth operates a substantial number of special or supplementary programs. The States and Territories may use the existence of special Commonwealth programs as a ground for reducing their own allocations to Indigenous services.

There is now no aggregate assessment of the needs of remote Australia and no mechanism to check that total allocated funds match the rhetoric and proclaimed intentions of governments.

Take the Northern Territory CGC allocation. According to a NT Council of Social Services analysis, in 2009 twenty-five per cent of the total \$4 billion budget came in special purpose payments from Canberra, mostly for indigenous services. A further 55% represented a GST allocation by the CGC. The report demonstrates that in 2006-07 the Darwin government underspent its CGC allocation by \$542 million across a range of key social welfare indicators. This represented no less than 42% of the total CGC allocation (NTCOSS, October 2008; see also *The Australian*, 24 October 2009). The NTCOSS report commented: 'The spending priorities of the NT government exacerbate the differences in measures and senses of equality for low-income and disadvantaged people thereby contributing to the reduced life expectancy, poor health, violence and other differences that they are intended to address'.

Another issue concerns allocations to local government. These are determined on a per capita basis. 'The bizarre result is that jurisdictions like the Northern Territory with one sixth of the Australian land mass receive less in local government assistance than is notionally allocated to the population of Geelong' (Dillon and Westbury, p. 188).

A dedicated and periodic CGC review of remote Australia needs and circumstances would seem to be a prime requirement. The data collected for the Expenditure assessments (noted earlier) could provide a basis for such analyses.

Whole-of-government policy development - a case study of CDEP: Whole-of-government is difficult to achieve not just in on-the-ground delivery, but also in processes of cross-departmental policy development. Despite its popularity and considerable impact in remote Australia, at the same time as it is promulgating ambitious employment targets, the government is also curtailing CDEP. At its peak, CDEP engaged some 40 000 people. 'From 2005, CDEP has been systematically dismantled.....without much evidence, CDEP is being blamed for cost shifting by governments and for poor mainstream employment outcomes....as CDEP is dismantled people will be given the choice of mainstream work or welfare, on the proviso that work might require migration from home communities...This policy change fails to recognise Indigenous aspirations, cultures and life projects' (Altman, 2009; also Sanders).

Seized by budgetary concerns and a larger paradigm concerning the need to enhance pressures on unemployed people to seek work, the specific situation of citizens in remote Australia has seemingly received short shrift. What is to be done in remote communities where there is zero conventional economic infrastructure? For example, to illustrate the effectiveness of CDEP, Altman describes the experience of the Kuninjku community in west Arnhem Land: 'For the majority of Aboriginal people in remote community's migration away from ancestral lands. and from extended kin networks will be neither an aspiration nor a solution. This in turn suggests that key institutions like CDEP that are currently being dismantled will need to be retained' (2009, p. 9). He notes the specific contributions of CDEP to the Kuninjku economy: harvesting game for local consumption; producing art for sale in the national and global arts markets; being employed in paid provision of environmental services.

A review of CDEP by the Department of Finance in 2009 (Finance, 2009) found that the scheme had very limited success in fulfilling its work readiness charter and that it was almost impossible to assess its community development contribution. It also noted these goals are likely to conflict. By contrast, Jon Altman (2011) observes: 'The Australian government (is committed) to radically reform the CDEP because it is erroneously and negatively perceived to hamper engagement with the mainstream labour market rather than positively as an enabler of remote livelihood possibilities in the hybrid economy. It is after all the highly variable interactions between customary, state and market sectors of hybrid economies from place to place that give them distinction and potential comparative advantage'. These perspectives played no role in the formal assessments.

The changes to the CDEP scheme in the NT also indicate the difficulties government faces in managing policy development on a whole-of-government basis. The acute problems recently experienced in town camps may be in part a consequence of reductions in CDEP employment. This displaced population from outstations and other settlements. This was the intended result. The scheme was run down without town camp capacities being augmented. Moreover, there was no development of new town-based employment

opportunities and no or little opportunity for mainstream employment, despite the promise in the COAG charter to narrow substantially the job gap.

Finally, the governance requirements for CDEP have been criticised for a want of cultural appropriateness: 'A number of developments in the CDEP program may be viewed as quite deliberately coercive and, occasionally, quite unrealistic by the Aboriginal organisations involved. They may fundamentally change an Aboriginal organisation's relationship to its community members. These include requirements that no more than 50% of the Board should be CDEP participants, supervisors or managers. In some remote areas almost all of the able-bodied adult population is on CDEP, making this requirement impossible to meet without changing the very nature of the organisation. Programs also have to meet DEWR-determined targets for placement of CDEP participants in non-CDEP jobs...which in some contexts is almost impossible' (Hunt, 2007, p. 159).

The *Indigenous Economic Development Strategy 2011-2018*, released in November 2011 seems to sideline the potential of hybrid economic activities as a likely source of employment in remote locations. It declares that the source of primary opportunity in remote locations lies in the existing labour market and in 'removing barriers to genuine commercial ventures' (p. 16). Later it gestures to green economy opportunities: 'As investment in clean energy sources such as solar, gas and wind increases, the growth of the clean energy sector will also provide many new opportunities. Through the Indigenous Carbon Farming Fund ..the Australian government will support Indigenous Australians to take up opportunities in carbon abatement activities. This may include savanna fire management, feral camel management and environmental planting.....Indigenous Protected Areas, while delivering significant environmental benefits, will also support economic endeavours such as ecotourism' (p. 17).

Conclusion: The Indigenous Clearing House in FaHCSIA maintains a register which records current, pending and past evaluation studies. There are currently 572 entries. Taking recent and pending years, 128 refer to studies due in 2010, 63 to studies due in 2012 and 121 studies have no precise date attached to them. These seem an extraordinary number. The sector is being heavily researched. The ANAO has three pending program studies, all due in 2011. However, not one study involves the effectiveness of the government's own governance. Indeed, as noted earlier, the major comprehensive overview of this policy area concluded that 'on balance' present uses were due more to the complexity of the area than to failures of governance (Department of Finance, 2010). The evidence reviewed here suggests this finding is at odds with the facts.