


ORIGINAL ARTICLE OPEN ACCESS

Implementing Indigenous Data Sovereignty in Australia: A Five-Phase Framework for Indigenous Data Governance

Jacob Prehn (Worimi)^{1,2} | Michael A. Guerzoni (Palawa)²  | Maggie Walter (Palawa)^{1,2} | Gawaian Bodkin-Andrews (D'harawal)^{1,3} | Bobby Maher (Yamatji, Noongar and Kija)^{1,4}

¹Maiaam nayri Wingara, Canberra, Australia | ²School of Social Sciences, University of Tasmania, Hobart, Australia | ³Division of the DVC, Indigenous Leadership, Western Sydney University, Penrith, Australia | ⁴National Centre for Aboriginal and Torres Strait Islander Wellbeing Research, The Australian National University, Canberra, Australia

Correspondence: Jacob Prehn (jacob.prehn@utas.edu.au)

Received: 2 May 2025 | **Revised:** 11 September 2025 | **Accepted:** 25 November 2025

Keywords: equity | implementation | indigenous data | indigenous data sovereignty | operationalisation | rights

ABSTRACT

This article presents the development of a five-phase Indigenous Data Governance (IDGov) Framework in Australia, focusing on partnerships between the Aboriginal Community Controlled Health Organisation (ACCHO) sector and non-Indigenous health entities. While the Indigenous Data Sovereignty (IDSov) movement has gained significant momentum over the past decade in Australia and other Anglo-colonised nation-states and beyond, the practical implementation of IDSov through community-led governance remains underdeveloped in the literature. This paper addresses that gap by offering definitional and conceptual clarity, alongside examples that center Indigenous leadership in operationalising data governance. We introduce a phased model of IDGov, mapping a progression from the absence of governance through partial and shared arrangements to Indigenous-majority and fully Indigenous-led governance structures. The model is illustrated through a case study involving a complex data-sharing agreement between one Indigenous and three non-Indigenous organisations within the Victorian health system. Roles and responsibilities across each phase are articulated to support practical implementation. While grounded in the health sector, the framework is adaptable to other domains such as education, justice, and land governance, where IDSov is increasingly critical. This work offers a pathway for operationalising IDSov and transforming data relations to reflect and uphold Indigenous rights, worldviews, and decision-making authority.

1 | Introduction and Context

The exponential growth of digital and online technologies has profoundly reshaped the global data landscape. With the proliferation of data creation, storage, and use, much of it personal, identifiable, and often collected without consent, questions of ownership, control, and governance have consequently become increasingly urgent (Irion 2012; Kukutai and Taylor 2016a; Pedreira et al. 2021). In response, discourses of data sovereignty have gained traction across multiple domains, notably among three key actors: Indigenous peoples, nation-states, and consumers (Hummel et al. 2021).¹ For Indigenous communities,

Indigenous Data Sovereignty (IDSov) asserts the right to control data that relates to their peoples, lands, cultures, and futures (Kukutai and Taylor 2016b). For nation-states, data sovereignty intersects with national security and economic protectionism, encompassing cyber, digital, and internet sovereignty (Couture and Toupin 2019). Meanwhile, consumers increasingly demand sovereignty over their personal data, particularly in the face of pervasive surveillance and data commodification (Seddon and Currie 2013).

This article focuses on the context of Aboriginal and/or Torres Strait Islander peoples in Australia and the mechanisms

This is an open access article under the terms of the [Creative Commons Attribution-NonCommercial-NoDerivs](https://creativecommons.org/licenses/by-nc-nd/4.0/) License, which permits use and distribution in any medium, provided the original work is properly cited, the use is non-commercial and no modifications or adaptations are made.

© 2025 The Author(s). *Australian Journal of Social Issues* published by John Wiley & Sons Australia, Ltd on behalf of Australian Social Policy Association.

through which Indigenous Data Governance (IDGov) can serve as a vehicle for realising IDSov. As defined by Aboriginal and Torres Strait Islander delegates to the inaugural Maïam nayri Wingara Summit, IDGov is “the right of Indigenous peoples to autonomously decide what, how, and why Indigenous data are collected, accessed, and used” (Maïam nayri Wingara 2018, 1). IDGov is not merely a technical intervention; it is a sovereign act. It reclaims the ability to make strategic decisions about data in ways that reflect Indigenous worldviews, cultural logics, and political aspirations. Broadly, IDGov comprises two interdependent domains: *Indigenous Governance of Data*, which focuses on control over data systems and infrastructure, and *Indigenous Data for Governance*, which emphasises the generation and mobilisation of data to support Indigenous decision-making and self-determination (Smith 2016; Rigney et al. 2022). This paper focuses primarily on the former, though we recognise the growing salience of the latter, particularly in the context of Indigenous nation-building and emerging treaty processes in Australia (Hobbs 2024).

While the conceptual underpinnings of IDSov and IDGov have been well articulated in both Australian (Lovett et al. 2019; Walter, Lovett, et al. 2021; Prehn et al. 2024) and international scholarship (Carroll et al. 2020; Kukutai and Taylor 2016b; Tsosie 2019; Walter, Kukutai, et al. 2021), significant gaps remain in the literature on implementation. The operationalisation of IDGov, particularly in contexts involving complex data-sharing arrangements with non-Indigenous actors, remains underdeveloped. Emerging work, including the *Taking Control of Our Data* discussion paper (Maïam nayri Wingara Indigenous Data Sovereignty Collective 2024), has begun to offer practical guidance, especially for Indigenous communities seeking to assert control within their own contexts. However, there remains at this time, limited empirical or practice-based research on how to implement IDGov in environments shaped by contractual obligations, regulatory constraints, or entrenched institutional power imbalances (Prehn et al. 2023; Sterling et al. 2024).

This paper addresses that gap by proposing a phased-based Indigenous Data Governance Framework to support the practical implementation of IDSov, particularly in cross-cultural and shared governance contexts. The framework is intentionally dynamic and adaptable, guiding institutions through a progression from no Indigenous involvement to co-governance, and ultimately to the full realisation of IDGov. In doing so, it offers a novel typology of IDGov maturity, extending existing theories of Indigenous sovereignty into the domains of data infrastructure and institutional practice. We present this work as primarily a collective of Aboriginal researchers, most of whom hold executive roles within the Maïam nayri Wingara Indigenous Data Sovereignty Collective, with several also serving as members of the Global Indigenous Data Alliance (GIDA). We acknowledge that work in IDSov and IDGov has not originated solely in Australia. These movements have been built through the contributions of Indigenous peoples worldwide and are being implemented across diverse global contexts (see Andersen et al. 2025). However, as IDSov and IDGov scholars articulate, while the broad principles are shared across the CANZUS countries, the actualisation of these needs to be directly aligned with the cultural and lived reality of the First Peoples to whom the data relate see (Prehn et al. 2024).

The structure of the paper is as follows. We begin by establishing definitional clarity around key terms, grounded in Indigenous-authored and endorsed frameworks. We then offer a conceptual clarification of (Indigenous) data governance, addressing common misinterpretations that dilute or obscure its authoritative significance. Building on this foundation, we introduce our five-phase IDGov model, detailing its core principles and applications. We conclude with a case study that illustrates the model in action, drawn from a collaborative arrangement involving one Indigenous and three non-Indigenous organisations, where IDGov has been both contested and partially realised.

2 | Definitions Matter

Definitions are not merely semantic tools; they are central to how we conceptualise, communicate, and enact change in complex domains. In the context of Indigenous Data, IDSov, and IDGov, definitions serve not only a descriptive function but also a political one; they assert sovereignty, epistemic authority, and the right to self-determination in data spaces that colonial logics have historically dominated.

In 2018, more than 40 Aboriginal and/or Torres Strait Islander delegates, including prominent Indigenous data experts, legal scholars, and representatives from every Australian state and territory, as well as the Torres Strait Islands, gathered with leading Māori data sovereignty advocates at the inaugural IDSov Summit. Over 2 days, participants engaged in collective deliberation to define key concepts that would guide the emerging IDSov movement in Australia. These definitions were formally endorsed by the Maïam nayri Wingara collective and designed to reflect the diversity of Indigenous communities and the complexities of data within their sociocultural, legal, and political contexts.

The definitions developed at this summit were also carefully aligned with internationally recognised standards as articulated by the Global Indigenous Data Alliance (GIDA 2025). As defined by Maïam nayri Wingara (2018, 1):

- Indigenous Data refers to information or knowledge, in any format or medium, that is about and may affect Indigenous peoples, both collectively and individually.
- Indigenous Data Sovereignty refers to the right of Indigenous peoples to exercise ownership over Indigenous Data. Ownership can be expressed through the creation, collection, access, analysis, interpretation, management, dissemination, and reuse of such data.
- Indigenous Data Governance refers to the right of Indigenous peoples to autonomously decide what, how, and why Indigenous Data are collected, accessed, and used. It ensures that data on or about Indigenous peoples reflect their priorities, values, cultures, worldviews, and diversity.

These definitions are not simply technical descriptors; they are declarations of Indigenous authority over knowledge systems and data infrastructures. Since their inception, they have been consistently upheld across multiple sectors. In 2023, more than 130 Indigenous participants reaffirmed

these definitions at the second IDSov gathering (Maiam nayri Wingara 2023). Further, in 2025, they received international endorsement from over 250 Indigenous delegates at the Global IDSov Summit in Canberra (Maiam nayri Wingara 2025). This iterative reaffirmation signals their ongoing legitimacy and their alignment with the evolving needs and aspirations of Indigenous communities.

The uptake of these definitions is evident across Australian public and institutional domains. Federal government policies (Commonwealth of Australia 2024), state and Indigenous legal agreements (First Peoples Assembly of Victoria and The State of Victoria 2022; Yoorrook Justice Commission 2021), academic literature (Bodkin-Andrews et al. 2024; Walter, Lovett, et al. 2021), and the operational frameworks of Indigenous community-controlled organisations (Maiam nayri Wingara Indigenous Data Sovereignty Collective 2024; VACCHO 2023a) all demonstrate their influence. As such, these definitions satisfy both prototypical (dictionary-style) and legal definitional criteria (Schiappa 2003) and have become embedded in both Indigenous and broader Australian lexicons; notwithstanding that we recognise, as others have done, that the term ‘sovereignty’ has Western (European) origins (Davis 2023). We acknowledge that Indigenous Australian peoples did not surrender nor cede their sovereignty to the colonial powers (Davis 2012).

Given their origins, scope, and widespread endorsement, we argue that any alternative definitions or classifications of Indigenous Data, IDSov, or IDGov must be approached with extreme caution. To disregard or dilute these terms is to undermine the sovereignty of the 40+ delegates who developed them in a spirit of collective self-determination. Moreover, redefining such concepts without transparent justification risks reinforcing the very colonial dynamics that the IDSov movement seeks to dismantle. As observed in other areas of Indigenous governance and knowledge, terminological shifts are often used to obscure power imbalances and serve institutional or commercial interests (Bodkin-Andrews and the D’harawal Traditional Descendants and Knowledge Holders Circle). For instance, some organisations claim to uphold IDSov or IDGov to satisfy funding or reporting requirements, while in practice retaining control over data infrastructure and decision-making, effectively reasserting colonial authority under the guise of ‘partnership’.

This disjuncture is exemplified in the Australian Government’s *Governance of Indigenous Data Framework*. Although the framework references the Maiam nayri Wingara (2018) definitions (Commonwealth of Australia 2024, 35), its deliberate use of the term *Governance of Indigenous Data*, rather than Indigenous Data Governance, signals a subtle yet significant conceptual departure. The distinction reflects the fact that while the government’s co-designed framework improves consultation and visibility, it falls short of the autonomy and authority required to meet the criteria for genuine IDGov as defined by Indigenous peoples.

According to the National Indigenous Australians Agency (NIAA), *Governance of Indigenous Data* refers to “the practices and processes governing the creation, collection, access, analysis, interpretation, management, dissemination, and reuse of Indigenous data” (Commonwealth of Australia 2024, 35). While

this framing may support increased Indigenous participation in data processes, it does not confer the strategic control or sovereign decision-making that IDGov requires. With the implementation of the framework beginning in January 2025, its outcomes remain uncertain. Whether it will serve as a transitional step toward Indigenous-led governance or merely reinforce existing hierarchies is yet to be determined. As Indigenous researchers and advocates, we will continue to watch closely, ensuring that the transformative intent of IDSov is neither misappropriated nor undermined.

3 | Conceptual Clarification: [Indigenous] Data Governance

Data governance has long been a topic of strategic relevance in organisational, governmental, and research settings (Horne 1995). However, in recent years, its importance has dramatically intensified. No longer confined to the domain of technical infrastructure or back-office operations, data are now recognised as a vital asset, one with significant implications for sovereignty, power, and justice. For Indigenous peoples, data governance is increasingly framed as a mechanism for empowerment and decolonisation (Kukutai and Taylor 2016b). For states, it is closely tied to national sovereignty and geopolitical control (Couture and Toupin 2019). For corporations and consumers, it represents a site of both value generation and vulnerability, particularly in relation to data commodification, surveillance, and exploitation (Seddon and Currie 2013; Pedreira et al. 2021; Woods 2018).

As data becomes more central to how societies function and how communities advocate for themselves, governance over that data becomes a foundational concern. Ethical and effective data governance is no longer a procedural add-on; it is essential infrastructure for Indigenous nationhood, service delivery, evidence-based policy, and cultural continuity. Robust governance frameworks, policies, and accountability structures are not optional; they are prerequisites for ensuring that data serves, rather than undermines, Indigenous priorities.

Nevertheless, despite its growing importance, the concept of data governance is frequently misunderstood and misapplied. One of the most persistent confusions in the literature, and in practice, is the conflation of *data governance* with *data management* (Abraham et al. 2019). The distinction is not semantic; it is structural. Data governance involves high-level, strategic decision-making about how data is handled across its entire lifecycle, from creation, use, and interpretation, through to use, re-use, and storage (Fu et al. 2011; Khatri and Brown 2010). It addresses the critical questions: Who decides what is collected? Why is it collected? How will it be used? By contrast, data management refers to the operational implementation of these decisions (Mahanti 2021). It involves executing the policies and standards determined through governance.

A helpful analogy is that of organisational leadership: governance is the domain of a board of directors setting strategic direction, while management is responsible for enacting that direction through daily operations (Considine et al. 2015). Similarly, in the context of IDGov, building capability through training and leadership development is key to ensuring that

Indigenous peoples are not merely consulted, but are leading, deciding, and ultimately governing how data systems serve their communities (Maiam nayri Wingara Indigenous Data Sovereignty Collective 2024).

This distinction is especially critical in the Australian context, where the language of “governance” is increasingly invoked but not always enacted. Many institutions and organisations now claim to be practising IDGov, but closer scrutiny often reveals practices that fall short of the definitions articulated by Indigenous peoples (Maiam nayri Wingara 2018). What is frequently labelled as IDGov may consist only of seeking periodic advice from Indigenous advisors, or of implementing co-management structures that still leave ultimate authority with non-Indigenous institutions. While such arrangements may reflect incremental progress or good intentions, they often fail to disrupt entrenched power dynamics in the Indigenous data ecosystem. Without a shift in who holds strategic decision-making power, these efforts risk reinforcing colonial patterns under the guise of inclusivity.

True Indigenous Data Governance, as defined by Maiam nayri Wingara (2018), requires that Indigenous peoples exercise *autonomy* over the creation, collection, access, and use of data about them. This is not a call for symbolic representation; it is a claim to jurisdiction. It is a demand for self-determination within the data landscape, where Indigenous priorities, legal orders, and knowledge systems guide decisions. Realising this vision necessitates more than policy statements or advisory roles; it requires conceptual clarity, institutional transformation, and a sustained commitment to Indigenous-led governance. Without these, the label of “governance” risks becoming yet another rhetorical device that conceals the persistence of settler control.

4 | A Five-Phased Indigenous Data Governance Framework

This section outlines the implementation of a five-phase Indigenous Data Governance Framework designed to support the realisation of IDSov. While some Indigenous organisations may already be well positioned to lead such efforts, for many non-Indigenous institutions and data-handling entities, the meaningful adoption of IDSov and IDGov requires profound cultural and structural transformation (Jelfs 2016; Walter 2016). Recognising that governance reform is a process rather than a singular act, this framework provides a structured pathway for progressing from the absence of Indigenous governance to its full enactment.

The implementation of IDSov through IDGov often demands a gradual but strategically coordinated effort. Deeply embedded norms, legacy systems, and institutional resistance may impede progress (Kukutai and Taylor 2016b; Carroll et al. 2021). Although sustained change requires time, careful planning must not become a pretext for delay. Organisational readiness for IDGov should be developed through a sequence of meaningful actions that transition an entity from a situation where IDSov is absent to one where it is embedded within everyday structures, relationships, and decision-making processes (Yap

and Yu 2016). To support this change process, we have included a set of reflective questions in Appendix A to guide organisations and services in implementing IDGov.

4.1 | The Trajectory Toward Indigenous Data Governance

As discussed earlier, Indigenous Data Governance affirms the right of Indigenous peoples to determine how data about them are created, collected, accessed, and used, ensuring alignment with Indigenous values, priorities, and worldviews (Maiam nayri Wingara 2018). To support organisations in realising this, we present a five-phase pathway, with each phase reflecting cumulative institutional change. This trajectory can be understood as an institutional change process framed by the 6 R's: Reflection, Realisation and Resolution, Reconnaissance, Restructuring, Revision, and Responsiveness (Guerzoni and Prehn 2026).

Across these stages, we suggest that *reflexive* practice and shared responsibility are critical, especially in early phases (Guerzoni and Prehn 2026). Preliminary and ongoing critical reflection can lead to *realisations* about what has contributed to the current context and environments requiring change, and in turn inform and underpin the *resolutions* made in response (Guerzoni and Prehn 2026). Before any changes are enacted, it is suggested that thorough *reconnaissance* is undertaken to acquire an assessment of the organisational context, to investigate the structures, perceptions, processes, policies, and norms within the organisation to build contextual understanding of how data, particularly Indigenous data, is understood, valued, and engaged (Guerzoni and Prehn 2026). It is from the pooling together and evaluation of this information that there can be a *restructuring* to align systems, structures, and policies, and finally, ongoing *revision* is necessary to ensure continuing *responsiveness*; as an organization has never “arrived” nor is a static entity; instead, organizations change over time (Guerzoni and Prehn 2026; Schein and Schein 2016). Crucially, data governance arrangements involving Indigenous data cannot be considered autonomous unless they are Indigenous-led (Maiam nayri Wingara 2018). The pathway demands clearly defined actions, timelines, and accountability mechanisms.

Avoiding bureaucratic delay is essential. For example, the federal *Governance of Indigenous Data Framework* is projected to take a decade to progress from Phase 1 to Phase 3. While this may reflect the scale and complexity of government departments and agencies, the timeframe is misaligned with the urgency of Indigenous peoples' demand for better data stewardship. Ideally, each phase should be completed within 12 to 18 months.

Organisations that have already demonstrated features of later phases may enter the framework at Phase 4 or 5. However, this requires a commitment to equitable responsibility-sharing to avoid overburdening Indigenous staff with the labour of transformation. A relational approach, where Indigenous peoples lead, and non-Indigenous colleagues walk alongside in support, best reflects the ethics of this work (Mohamed et al. 2024). The framework should support organisational progress through

broader structural and cultural change, discussed further in Section 4.2.

4.2 | Phase 1: No Indigenous Data Governance

This is the phase that most organisations will likely be in, where Indigenous peoples do not have the authority to make decisions in respect to, and over, Indigenous data. As such, this can therefore be characterised as the “default phase” for organisations, where policies and procedures concerning data governance and its management tend to be organisationally centred (rather than Indigenous centred). Whilst we recognise a difference between having input from Indigenous peoples in some capacity, in contrast to no capacity, we argue that this phase also includes organisations that possess Indigenous advisory groups that *do not hold* formal decision-making powers. While advisory roles may suggest inclusion, and even those within organisations having their hearts “in the right place” regarding wanting to hear from Indigenous peoples, it is noted that Indigenous participants report that their input in such advisory groups or committees is often ignored, with little to no tangible outcomes; particularly when participation is tokenistic and often unpaid (Maiam nayri Wingara Indigenous Data Sovereignty Collective 2024).

The first step in this phase is structured *reflection* by organisational leaders. This means examining their assumptions about Indigenous peoples, the nature and value of data (what “counts” as data), and their motivations for engaging with IDGov (for the benefit of Indigenous peoples, to meet a KPI, or to curry favour with an individual or entity). At this initial stage, *reflecting* on what is considered “normal” in how data is viewed and used is crucial, as these perspectives are often shaped by colonial power structures (Guerzoni and Prehn 2026). For example, government agencies may collect data from Indigenous peoples as part of “service” delivery, yet in doing so consolidate resources and authority in ways that serve the settler-colonial state while undermining Indigenous values, knowledges, and practices. Recognising these costs and consequences lays the groundwork for genuine resolutions and progress. Without such foundations, resolutions risk corroding into mere rhetoric.

Organisations should then appoint a team, including Indigenous participants compensated for their expertise and time, to conduct a *reconnaissance* of how IDGov can be meaningfully implemented in their context. This may involve gathering written submissions, hearing presentations from staff, and auditing policy and procedure documents to assess how Indigenous data is understood and used, and the extent to which organisational norms and practices align with Maiam nayri Wingara's IDGov and IDGov principles (Maiam nayri Wingara Indigenous Data Sovereignty Collective 2024).

4.3 | Phase 2: Some Governance of Indigenous Data

An organisation that is within this phase may be distinguished from another entity within Phase 1 because one or two Indigenous individuals hold some decision-making power in a largely non-Indigenous organisation. While it can be said this is an important

step forward, the power imbalance between the Indigenous person or persons and the organisation they are based in often results in their decision-making roles being tokenistic, unable to lead to meaningful change. This is especially true where no formal structures or resources support Indigenous authority within the organisation. The input from the Indigenous person can end up facing the same fate as that received from an Indigenous advisory group, appreciated and welcomed, but without the weight to create change independent of other stakeholders.

Organisations should develop robust terms of reference, clarify organisational responsibilities, and allocate sufficient resourcing to ensure Indigenous participation is not solely symbolic. A clear partnership between Indigenous and non-Indigenous stakeholders within the organisation, along with annual reviews at management and governance levels, is critical to monitor and support progression with these intended goals.

4.4 | Phase 3: Co-Governance of Indigenous Data

An organisation within Phase 3 has governance bodies with approximately equal representation from Indigenous and non-Indigenous communities. This structure marks important progress because it enables and supports shared decision-making, rather than where Indigenous peoples are in the minority as seen in the earlier phases. This more balanced arrangement of Phase 3 marks a move toward more equitable practices.

Several arrangements can be put in place to strengthen the governance capacity of Indigenous peoples. For example, having co-chair arrangements on relevant governance committees and boards between Indigenous and non-Indigenous peoples, with the capacity for alteration of leadership across the sitting year and/or within meetings. There is also the capacity for mentoring arrangements to be implemented within one's workload, so that Indigenous staff are supported in, and transition into, further leadership roles. Being intentional about recruitment, development, and succession planning for Indigenous staff is also essential, especially among more senior Indigenous staff. Importantly, as mentioned earlier, the relevant governance committee must be empowered to shape and implement data policies, not merely be consulted on them. Regular evaluations ensure that co-governance remains substantive, rather than symbolic; this can be achieved through reviews of minutes and interviews with committee members. Additionally, updating policies and procedures that reflect Indigenous decision-making and governance structures within the organisation is required.

4.5 | Phase 4: Majority Governance of Indigenous Data

In this phase, Indigenous people hold a majority of seats on governance committees (and any decision-making meeting requires a quorum with an Indigenous majority), ensuring decisions are more likely to reflect Indigenous priorities regarding IDGov and IDGov (as well as other areas that matter). A key example of this, about research and data, is the Indigenous-majority steering committee of the Longitudinal Study of Indigenous Children, an ongoing and extensive Australian-based study (Walter et al. 2017).

However, it is important to be mindful that majority representation does not automatically translate into power within both the committee and the organisation more broadly. As Bodkin-Andrews and colleagues (2024) caution, formal authority must accompany numerical representation to prevent non-Indigenous control from persisting behind the scenes. This means that organisations must ensure governance bodies have genuine decision-making power that can lead to change in the everyday functioning of the organisation, and that thereby works to ensure that Indigenous perspectives are not overridden in practice across the organisation. For example, IDSoV principles become part of how Indigenous peoples and their data are engaged with, rather than only being ‘recommendations’. To formalise Indigenous decision-making and leadership, organisational policies and procedures are required to be reviewed and updated to embed these structures within the organisation.

4.6 | Phase 5: Indigenous Data Governance

IDGov is achieved when Indigenous peoples possess full authority to govern their data. This includes the existence of a dedicated Indigenous-led IDGov committee, with clearly delegated authority, enforceable policies, and a strong and meaningful role within the broader organisational structure and its everyday functioning.

Non-Indigenous individuals may contribute to this committee as invited advisors, observers, or technical experts (perhaps present as *ex officio*), but do not hold voting rights. The committee determines when and how external expertise is engaged as part of its operations. For this phase to work effectively and endure, respect for Indigenous leadership guided by a diversity of Indigenous voices is foundational. Furthermore, IDGov principles should extend to the highest levels of an organisation, including board decision-making. Annual or biennial reviews are advised to

be part of this phase, recognising that they can ensure ongoing integrity and accountability. Further, updating organisational policies and procedures is essential to outline Indigenous decision-making and leadership as core to business operations.

4.7 | Accompanying Systems Change: Organisational and Cultural

IDGov cannot succeed in isolation; it must be supported by broader institutional change. Alignment across leadership, operations, and organisational culture is essential to embed sustainable governance (Tables 1–3).

Structural and cultural transformation is critical to the success of the IDGov Framework. Without alignment between governance committees, policies, workflows, and leadership, even well-intentioned efforts may falter. As Schein and Schein (2016) observe, managers play a pivotal role in cultural change, reinforcing or reshaping values through practice. A holistic, whole-of-organisation approach is essential to ensure that governance structures are not only established but fully operationalised.

5 | Applying the Framework to Indigenous Cancer Screening Data

This section outlines the application of the Phased Indigenous Data Governance Framework to Indigenous cancer screening data within the Victorian Cancer Screening Framework (VCSF) partnership.² The Indigenous Data Governance Framework discussed here applies to a complex data arrangement involving four partner organisations. The case study focuses on Indigenous people’s cancer screening data. The VCSF team consists of one Indigenous and three non-Indigenous organisations:

TABLE 1 | Organisational changes to consider.

Domain	Change
Policy & Governance	Develop and implement an IDGov policy or update existing frameworks to include it, reviewing annually Clarify the IDGov committee’s position within the broader structure, reviewed annually
Data management and technology	Ensure data management aligns with strategic decisions, reviewed annually Establish secure data-sharing agreements that prioritise benefits and protections for Indigenous peoples Use secure hardware/software to safeguard Indigenous data
Operational practices	Build partnerships with Indigenous communities to strengthen data relationships Invest in capacity building for Indigenous peoples in data governance Ensure accountability for IDGov implementation Provide regular staff training on IDGov and IDSoV Establish Indigenous-led mechanisms to ensure the long-term sustainability of the organisation
Funding and resourcing	Secure adequate funding to drive organisational and cultural change Ensure Indigenous peoples are remunerated for their contributions

- Victorian Aboriginal Community Controlled Health Organisation (VACCHO), an Indigenous organisation.
- Australian Centre for the Prevention of Cervical Cancer (ACPCC), a non-Indigenous organisation.
- Breast Screen Victoria (BSV), a non-Indigenous organisation.
- Cancer Council Victoria (Cancer Council), a non-Indigenous organisation.

Given the relatively recent emergence of Indigenous Data Sovereignty (IDSov) and IDGov in practice, and the limited experience in data governance among both Indigenous staff and partner organisations, this section focuses on practical implementation pathways. We propose that VCSF partners initially adopt *Phase 3: Co-Governance of Indigenous Data*, reflecting current capabilities and relational readiness. As a medium-term goal, we recommend progressing toward Phase 5: Full Indigenous Data Governance, ideally within a two- to three-year timeframe, contingent upon ongoing resourcing, investment in First Peoples' data literacy, and sustained partner commitment.

5.1 | Indigenous Cancer Screening Data

The VCSF partnership oversees a range of Indigenous cancer screening data, including screening types, cancer diagnoses, holistic health assessments, and individual patient records, which may include historical health information. These data fall squarely within the definition articulated by Maiam nayri Wingara (2018, p. 1), which defines Indigenous data as “information or

TABLE 2 | Cultural changes to consider.

Domain	Change
Education and awareness	Provide education on Indigenous data, IDSov, and IDGov for staff and stakeholders
Relationship building	Foster respectful, collaborative relationships with Indigenous communities
Mindset shift	Promote organisational values that recognise Indigenous knowledge as crucial to data governance, viewing staff as custodians rather than data owners
Workplace inclusion	Develop an Indigenous data strategy to formalise IDSov and promote inclusivity
Commitment to equity	Make public commitments to Indigenous data equity, positioning the organisation as a leader in the field both presently and into the future

TABLE 3 | Terms of reference and standard operating procedures.

Terms of reference	Standard operating procedure
Role, purpose, and responsibilities	Meeting rules and frequency
Scope of authority and decision-making	Conducting meetings
Membership requirements and term lengths	Behavioural expectations
Remuneration and training provision	Secretariat duties and support

knowledge, in any format or medium, which is about, and may affect, Indigenous peoples collectively and individually.”

5.2 | Indigenous Data Governance Committee

The Indigenous Data Governance Committee will oversee the full lifecycle of Indigenous cancer screening data, from creation and collection to access, use, publication, and storage. Its purpose is to ensure that data practices align with Indigenous worldviews, values, and governance principles (Lovett et al. 2020). Initially, the committee will operate as a Co-Governance of Indigenous Data Committee, with equal Indigenous and non-Indigenous membership. It is critical to reiterate that the committee cannot be designated as an Indigenous Data Governance Committee until it is composed entirely of Indigenous members.

Figure 1 illustrates the roles and relationships among three key stakeholders: the committee, VCSF partner organisations, and First Peoples in Victoria. This governance model is designed to ensure relational accountability and a gradual progression toward Indigenous-led governance.

5.3 | VCSF Partner Organisations

The VCSF partner organisations include VACCHO, ACPCC, BSC, and the Cancer Council. These organisations operate under an agreement governing the use of both Indigenous and non-Indigenous cancer screening data across Victoria (VACCHO 2023b). To enable effective IDGov, each partner organisation should reflect on its internal readiness. Key considerations include the proportion of Indigenous staff, especially in senior roles, levels of staff data literacy, the existence of Indigenous-specific data policies or clauses within broader data policies, and remuneration structures. The collective goal is to build institutional cultures and systems that uphold and operationalise Indigenous data sovereignty across the VCSF.

5.4 | Indigenous Peoples in Victoria

The Co-Governance Committee is ultimately accountable to Indigenous Peoples in Victoria. Trust in data practices is essential: when communities understand and value how their data are governed, participation in screening programs increases, resulting

in improved data quality and health outcomes (Williamson et al. 2021). Where concerns arise regarding data governance, communities must be empowered to raise them with the Co-Governance Committee and VCSF partner organisations. Importantly, Victoria now has stronger accountability mechanisms in place, including Indigenous-led institutions, greater recognition of Indigenous data rights by governments, and an increase in advocacy, knowledge, and technical capacity among First Peoples.

5.5 | The Co-Governance of Indigenous Data

We recommend that VCSF organisations initially implement Phase 3: Co-Governance of Indigenous Data (see Figure 2).

This recommendation acknowledges the current state of IDSoV and IDGov implementation within the partnership. Co-governance represents a practical and necessary step forward, while recognising that deeper socialisation and institutional reform will be required for full IDGov.

Figure 3 outlines the structure of the Co-Governance Committee, which should consist of equal numbers of Indigenous and non-Indigenous representatives. Indigenous members should bring lived experience and expertise in Indigenous Data Governance and/or cancer screening. Non-Indigenous members should offer technical expertise and a demonstrated ability to work respectfully and collaboratively with Indigenous peoples.

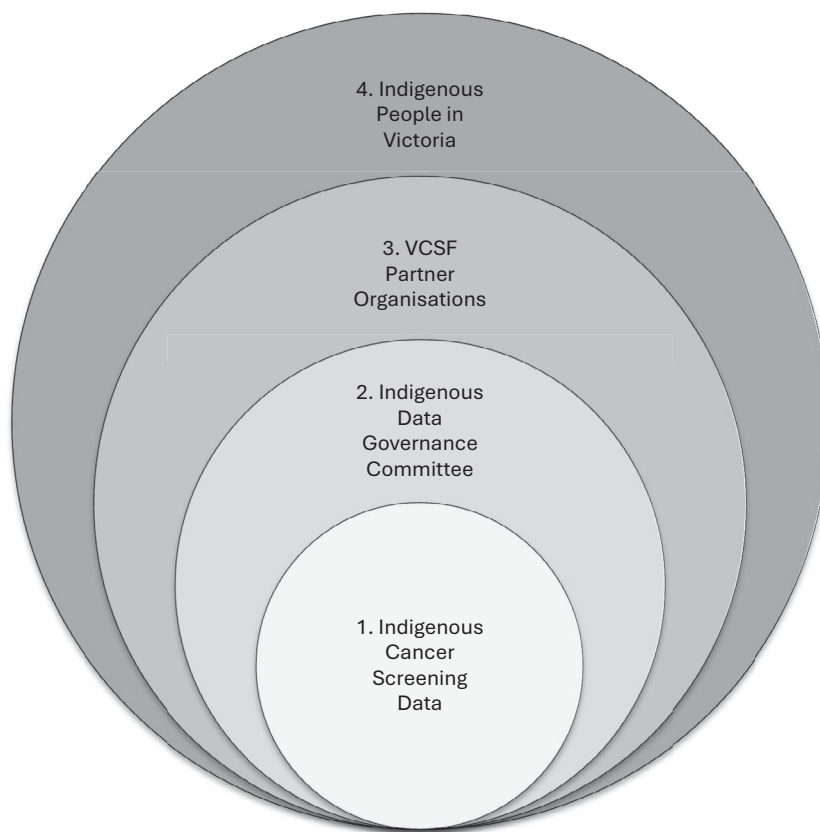


FIGURE 1 | Indigenous Data Governance framework for indigenous cancer screening data.

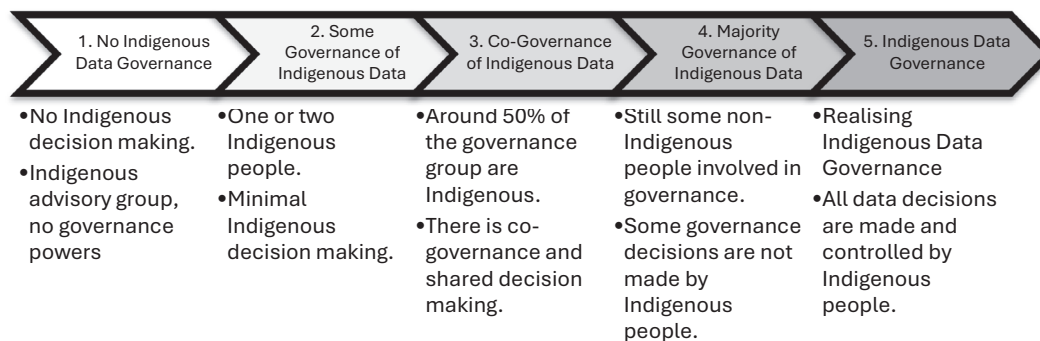


FIGURE 2 | The progression toward Indigenous Data Governance (IDGov). (Please note that Appendix A includes a full-page version of this diagram to assist Indigenous and non-Indigenous peoples in identifying which phase they are currently in, while also providing space to articulate how phase five could be realised).

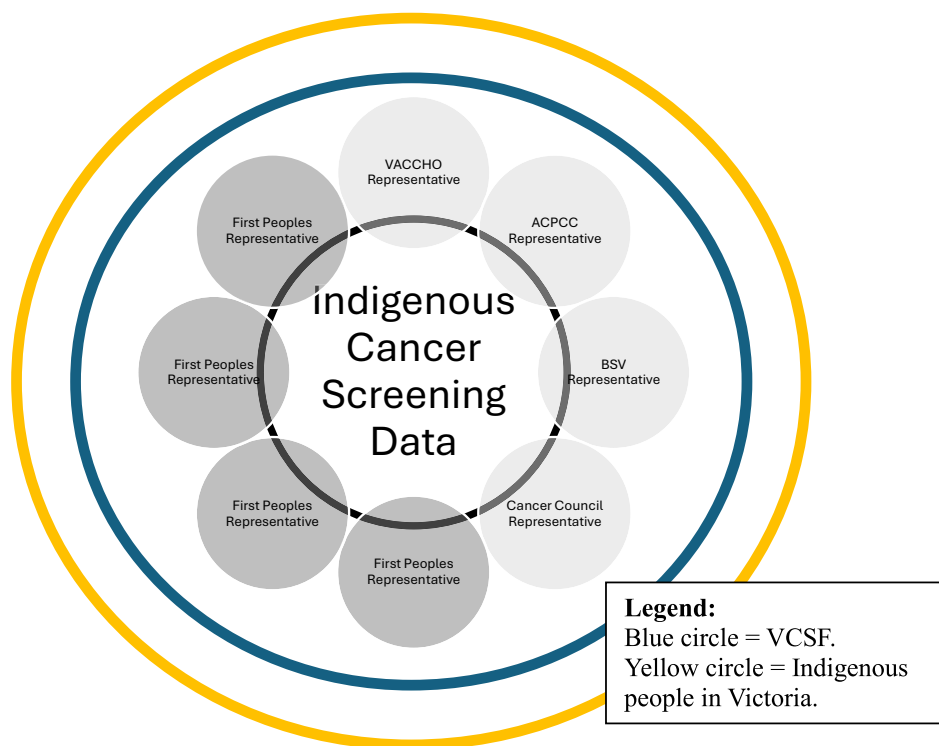


FIGURE 3 | Co-governance of Indigenous data committee within the VCSF. Blue circle = VCSF. Yellow circle = Indigenous people in Victoria.

A co-chairing arrangement is encouraged to promote shared leadership, enhance mutual accountability, and prevent an undue burden on Indigenous members. Adequate organisational resourcing is essential to support meaningful participation, and transparent processes must be in place to ensure workload equity. The committee should operate as a forum of equals, not one shaped by hierarchy or institutional titles, with Indigenous members recognised as full strategists, decision-makers, and policy leaders. If the chair is non-Indigenous, an Indigenous co-chair should be appointed and supported to transition into complete leadership as the committee progresses toward Phase 5.

A co-governance model offers a clear pathway toward Indigenous Data Governance. The Maïam nayri Wingara Indigenous Data Sovereignty Collective (2024) highlights the importance of establishing a Terms of Reference (ToR) and a Standard Operating Procedure (SOP). While there is no single template, Indigenous representatives must oversee the drafting, and lead the ratification (voting and agreement), and formalisation (implementation as formal rules) process to ensure alignment with Indigenous worldviews, values, and governance protocols. Non-Indigenous members can support this work by bringing relevant policy and legal expertise, while walking alongside Indigenous colleagues in a spirit of partnership.

As illustrated in Figure 3, the full realisation of IDGov will eventually require replacing non-Indigenous representatives with Indigenous members. Currently, these roles are occupied by non-Indigenous staff due to the composition of existing data teams. However, organisations could appoint external Indigenous members, as is common in board structures, to reduce potential conflicts of interest and accelerate progression toward Indigenous autonomy (Considine et al. 2015).

This section has outlined a practical pathway for applying the Phased Indigenous Data Governance Framework within the VCSF partnership. Considering current organisational capabilities, staffing composition, and the emerging nature of IDSoV in the sector, we recommend that VCSF partners begin at Phase 3: Co-Governance of Indigenous Data. With appropriate resourcing, increased investment in Indigenous data literacy, and a commitment to shared leadership, it is feasible to progress toward Phase 5: Full Indigenous Data Governance within a two- to three-year timeframe.

Such a transition represents more than administrative reform; it signifies a shift in institutional power, practice, and accountability. Ultimately, the VCSF model offers a replicable framework for other cross-sectoral partnerships seeking to realise Indigenous data sovereignty in health and beyond.

6 | Conclusion

In recent years, significant developments in IDSoV and IDGov scholarship, both in Australia and internationally, have contributed to noticeable shifts in how Indigenous peoples and their data are conceptualised and considered (Commonwealth of Australia 2024; First Peoples Assembly of Victoria and The State of Victoria, 2022; Yoorrook Justice Commission 2021; VACCHO 2023a). Importantly and commendably, we see that these two concepts possess agreed and defended definitions, are being engaged with internationally, and are also applied to localised contexts (Andersen et al. 2025). This indicates that work in this field has a strong conceptual foundation, supported by Indigenous consensus, and is moving into a stage of implementation through the systemic processes of organisations and

government agencies. Realising this shift requires frameworks that can guide reflection and provide a clear visualisation of the processes involved in implementing IDSov and IDGov across diverse organisational and governmental contexts.

This paper has sought to contribute to the work of IDSov and IDGov application by presenting our approach to the development and application of a phased Indigenous Data Governance Framework, tailored to the Australian context. In doing so, it has sought to provide both conceptual grounding and practical guidance for individuals, communities, organisations, and other entities committed to realising IDSov across the Indigenous data ecosystem. We have emphasised the importance of working from and toward the correct definition of IDGov, as per the agreed definition from (Maiam nayri Wingara 2018, 2023), one that is led and defined by Indigenous peoples. Adhering to this definition is critical to avoiding the unintended reinforcement of colonial data paradigms under the guise of inclusion or reform. Through conceptual clarification, we have addressed some of the common misunderstandings about data governance, and highlighted the structural, cultural, and relational conditions necessary for achieving IDSov.

The five-phase Indigenous Data Governance Framework provides a practical roadmap for data-handling entities, serving as a starting point to assess their current positioning and identify steps toward achieving full Indigenous governance. It acknowledges that transformation is not linear, but instead cumulative, requiring reflexivity, accountability, and long-term investment. The case study included from the Victorian Cancer Screening Framework (VCSF) demonstrates that tangible progress toward IDGov is achievable, even within complex, multi-institutional arrangements within the context of health. With intentional planning and sustained commitment, short- and medium-term gains can lay the foundation for enduring Indigenous leadership in data governance, both within health contexts and in other areas, such as education, employment, justice, and land governance.

Ultimately, implementing IDGov ensures that Indigenous data is governed in ways that uphold the rights, priorities, cultures, and worldviews of Indigenous peoples (Maiam nayri Wingara 2018). For those moving from theory to practice, Appendix A and the Maiam nayri Wingara (2024) *Taking Control of Our Data* Discussion Paper provide practical next steps. Building on these resources, we call on organisations and governments to embed Indigenous self-determination in data governance and to actively advance awareness and respect for IDSov and IDGov across Australia.

Author Contributions

The authors developed this article collaboratively, bringing together their collective expertise to strengthen the Indigenous Data Rights of Aboriginal and Torres Strait Islander peoples across Australia. Through shared conceptualisation, co-writing, and Indigenous leadership, the team worked to ensure the article advances culturally grounded, rights-based approaches to data governance and sovereignty.

Acknowledgements

We wish to acknowledge Clare O'Reilly and the Victorian Aboriginal Community Controlled Health Organisation (VACCHO) for their

collaboration and generosity in allowing us to use the Victorian Cancer Screening Framework (VCSF) Indigenous Data Governance Project as a case study. Thank you.

Conflicts of Interest

The authors declare no conflicts of interest.

Data Availability Statement

Data sharing not applicable to this article as no datasets were generated or analysed during the current study.

Endnotes

¹ In this article, we respectfully use the term *Indigenous* to align with international Indigenous Data Sovereignty movements and to draw on the power of strategic essentialism (Spivak, 2023), through which Indigenous and First Nations peoples have united and learned from one another in their advocacy for data sovereignty.

We acknowledge, however, that *Indigenous* is a contested term, as it can homogenise diverse peoples into a single category. In the Australian context, our general preference is to name specific Aboriginal and/or Torres Strait Islander Mobs (sociocultural groups), and this approach is adopted in parts of this paper where appropriate.

² While this case study is situated in a health context, the five-phase IDGov framework is malleable and readily adaptable to other domains, including education, employment, justice, and land governance; however, meaningful Indigenous leadership is essential for progress and success, along with the other matters explored in this paper.

References

- Abraham, R., J. Schneider, and J. vom Brocke. 2019. "Data Governance: A Conceptual Framework, Structured Review, and Research Agenda." *International Journal of Information Management* 49: 424–438. <https://doi.org/10.1016/j.ijinfomgt.2019.07.008>.
- Andersen, C., M. Walter, T. Kukutai, and C. Gabel. 2025. *Indigenous Statistics: From Data Deficits to Data Sovereignty*. Taylor & Francis.
- Bodkin-Andrews, G. 2022. "Traditional Descendants and Knowledge Holders Circle." In *The colonial storytelling of good intent*. <https://www.griffithreview.com/articles/the-colonial-storytelling-of-good-intent/>.
- Bodkin-Andrews, G., J. Prehn, C. Price, M. Walter, and K. Martin. 2024. "Investigating Racism Measures Through an Indigenous Data Sovereignty Lens." In *Longitudinal Methods in Youth Research: Understanding Young Lives Across Time and Space*, 163–185. Springer.
- Carroll, S. R., I. Garba, O. L. Figueroa-Rodríguez, et al. 2020. "The CARE Principles for Indigenous Data Governance." *Data Science Journal* 19: 43.
- Carroll, S. R., E. Herczog, M. Hudson, K. Russell, and S. Stall. 2021. "Operationalizing the CARE and FAIR Principles for Indigenous Data Futures." *Scientific Data* 8, no. 1: 108. <https://doi.org/10.1038/s41597-021-00892-0>.
- Commonwealth of Australia. 2024. "Framework for Governance of Indigenous Data: Practical Guidance for the Australian Public Service." Australian Federal Government.
- Considine, M., S. O'Sullivan, and P. Nguyen. 2015. "Governance, Boards of Directors and the Impact of Contracting on Not-For-Profits Organizations—An Australian Study." In *Contracting-Out Welfare Services*, 55–74. Wiley. <https://doi.org/10.1002/9781119016458.ch3>.
- Couture, S., and S. Toupin. 2019. "What Does the Notion of 'Sovereignty' Mean When Referring to the Digital?" *New Media & Society* 21, no. 10: 2305–2322.

- Davis, M. 2012. "Constitutional Recognition Does Not Foreclose on Aboriginal Sovereignty." *Indigenous Law Bulletin* 8, no. 1: 12–14.
- Davis, M. 2023. "Voice of Reason on Recognition and Renewal." *Quarterly Essay* 90: 1–70.
- First Peoples Assembly of Victoria and The State of Victoria. 2022. "Treaty Authority Agreement."
- Fu, X., A. Wojak, D. Neagu, M. Ridley, and K. Travis. 2011. "Data Governance in Predictive Toxicology: A Review." *Journal of Cheminformatics* 3: 1–16.
- GIDA. 2025. The Global Indigenous Data Alliance (GIDA). <https://www.gida-global.org/>.
- Guerzoni, M., and J. Prehn. 2026. "Decolonization or Indigenization of social work? Definitional distinctions and application within education, practice and research." In *Aboriginal Social Work Voices*, edited by B. Bennett and J. Prehn, 61–82. Bloomsbury.
- Hobbs, H. 2024. "Taking Stock of Indigenous-State Treaty-Making in Australia: Opportunities and Challenges." *UNSWLJ* 47: 548.
- Horne, N. W. 1995. "Information as an Asset, the Board Agenda." *Computer Audit Update* 1995, no. 9: 5–11.
- Hummel, P., M. Braun, M. Tretter, and P. Dabrock. 2021. "Data Sovereignty: A Review." *Big Data & Society* 8, no. 1: 12. <https://doi.org/10.1177/2053951720982012>.
- Irion, K. 2012. "Government Cloud Computing and National Data Sovereignty." *Policy & Internet* 4, no. 4: 40–71.
- Jelfs, P. 2016. "The Australian Bureau of Statistics' Aboriginal and Torres Strait Islander Enumeration and Engagement Strategies: Challenges and Future Options." In *Indigenous Data Sovereignty: Toward an Agenda*, edited by T. Kukutai and J. Taylor, 275. ANU Press.
- Khatri, V., and C. V. Brown. 2010. "Designing Data Governance." *Communications of the ACM* 53, no. 1: 148–152.
- Kukutai, T., and J. Taylor. 2016a. "Data Sovereignty for Indigenous Peoples: Current Practice and Future Needs." In *Indigenous Data Sovereignty: Toward an Agenda*, edited by T. Kukutai and J. Taylor, 99–115. ANU Press.
- Kukutai, T., and J. Taylor. 2016b. *Indigenous Data Sovereignty: Toward an Agenda*. ANU Press.
- Lovett, R., M.-M. Brinckley, B. Phillips, et al. 2020. "Marrathalpu Mayingku Ngiya Kiyi. Minyawaa Ngiyani Yata Punmalaka; Wangaaypu Kirrampili Kara [Ngiyampaa Title]; in the Beginning It Was Our People's Law. What Makes Us Well; to Never Be Sick. Cohort Profile of Mayi Kuwayu: The National Study of Aboriginal and Torres Strait Islander Wellbeing [English Title]." *Australian Aboriginal Studies* 2: 8–30.
- Lovett, R., V. Lee, T. Kukutai, D. Cormack, S. C. Rainie, and J. Walker. 2019. "Good Data Practices for Indigenous Data Sovereignty and Governance." In *Good Data*, edited by A. Daly, S. K. Devitt, and M. Mann, 26–36. Institute of Network Cultures.
- Mahanti, R. 2021. *Data governance and data management*. Springer Singapore.
- Maiam nayri Wingara. 2018. "Indigenous Data Sovereignty Communique: Indigenous Data Sovereignty Summit 20/06/2018. Maiam nayri Wingara." <https://static1.squarespace.com/static/5b3043afb40b9d20411f3512/t/5b6c0f9a0e2e725e9cabf4a6/1533808545167/Communique%2B-%2BIndigenous%2BData%2BSovereignty%2BSummit.pdf>.
- Maiam nayri Wingara. 2023. "Indigenous Data Governance Communique: Indigenous Data Governance Summit 13/06/2023. Maiam nayri Wingara." <https://static1.squarespace.com/static/5b3043afb40b9d20411f3512/t/64f7b64b19d9dd4616bf2c75/1693955660219/Indigenous+Data+Governance+Communique+2023.pdf>.
- Maiam nayri Wingara. 2025. "Global Indigenous Data Sovereignty Conference Communique, Canberra, Australia."
- Maiam nayri Wingara Indigenous Data Sovereignty Collective. 2024. "Taking Control of Our Data: A Discussion Paper on Indigenous Data Governance for Aboriginal and Torres Strait Islander People and Communities." <https://www.lowitja.org.au/wp-content/uploads/2024/01/Taking-Control-of-Our-Data-Discussion-Paper.pdf>.
- Mohamed, J., K. Stacey, C. Chamberlain, and N. Priest. 2024. "Cultural Safety in Australia: Discussion Paper." https://www.lowitja.org.au/wp-content/uploads/2024/08/CulturalSafetyinAustralia_DiscussionPaper_August2024.pdf.
- Pedreira, V., D. Barros, and P. Pinto. 2021. "A Review of Attacks, Vulnerabilities, and Defenses in Industry 4.0 With New Challenges on Data Sovereignty Ahead." *Sensors (Basel)* 21, no. 15: 5189.
- Prehn, J., C. Price, G. Bodkin-Andrews, M. Walter, and R. Lovett. 2024. "Social Research and Indigenous Data Sovereignty." In *The Sage Handbook of Data and Society*, edited by T. Venturini, A. Acker, J.-C. Plantin, and T. Walford. Sage.
- Prehn, J., R. Taitingfong, R. Rowe, et al. 2023. *Indigenous Data Governance and Universities Communiqué*. GIDA. <https://static1.squarespace.com/static/5b3043afb40b9d20411f3512/t/65387f22b4b2bb12e26e6f59/1698201379176/GIDA+Communique+2023.pdf>.
- Rigney, D., S. Bignall, A. Vivian, and S. Hemming. 2022. "Indigenous Nation Building and the Political Determinants of Health and Wellbeing. In: Lowitja Institute Melbourne."
- Schein, E. H., and P. Schein. 2016. *Organizational Culture and Leadership*. 5th ed. John Wiley & Sons.
- Schiappa, E. 2003. *Defining reality: Definitions and the politics of meaning*. SIU Press.
- Seddon, J. J., and W. L. Currie. 2013. "Cloud Computing and Trans-Border Health Data: Unpacking US and EU Healthcare Regulation and Compliance." *Health Policy and Technology* 2, no. 4: 229–241.
- Smith, D. E. 2016. "Governing Data and Data for Governance: The Everyday Practice of Indigenous Sovereignty." In *Indigenous Data Sovereignty: Toward an Agenda*, edited by T. Kukutai and J. Taylor, 117–138. ANU Press.
- Spivak, G. C. 2023. "Can the Subaltern Speak?" In *Imperialism: Critical Concepts in Historical Studies*, edited by P. H. Cain and M. Harrison, 171–219. Routledge.
- Sterling, R., T. Kukutai, T. Chambers, and A. T.-Y. Chen. 2024. "A Māori Data Governance Assessment of the NZ COVID Tracer App." *Discover Social Science and Health* 4, no. 1: 32.
- Tsosie, R. 2019. "Tribal Data Governance and Informational Privacy: Constructing Indigenous Data Sovereignty." *Montana Law Review* 80: 229.
- VACCHO. 2023a. "Position Statement: Indigenous Data Sovereignty. VACCHO." https://www.vaccho.org.au/wp-content/uploads/2024/03/20231213-VACCHO-Position-Statement-IDSov_FINAL.pdf.
- VACCHO. 2023b. "Victorian Aboriginal Cancer Journey Strategy 2023–2028." https://www.vaccho.org.au/wp-content/uploads/2023/05/VACCHO_Victorian-Aboriginal-Cancer-Journey-Strategy-2023-2028_Web.pdf.
- Walter, M. 2016. "Data politics and Indigenous representation in Australian statistics." In *Indigenous Data Sovereignty: Toward an agenda*, edited by T. Kukutai and J. Taylor, 79–97. ANU Press.
- Walter, M., T. Kukutai, S. R. Carroll, and D. Rodriguez-Lonebear. 2021. *Indigenous data sovereignty and policy*. Routledge.
- Walter, M., R. Lovett, B. Maher, et al. 2021. "Indigenous Data Sovereignty in the Era of Big Data and Open Data." *Australian Journal of Social Issues* 56, no. 2: 143–156.
- Walter, M., K. L. Martin, and G. Bodkin-Andrews. 2017. *Indigenous Children Growing Up Strong: A Longitudinal Study of Aboriginal and Torres Strait Islander Families*. Springer.

- Williamson, B., J. Prehn, M. Walter, et al. 2021. "Indigenous Peoples and the Australian Census: Value, Trust, and Participation." *Australian Population Studies* 5, no. 2: 1–14. <https://doi.org/10.37970/aps.v5i2.89>.
- Woods, A. K. 2018. "Litigating Data Sovereignty." *Yale Law Journal* 128: 328–406.
- Yap, M., and E. Yu. 2016. "Operationalising the Capability Approach: Developing Culturally Relevant Indicators of Indigenous Wellbeing—An Australian Example." *Oxford Development Studies* 44, no. 3: 315–331.
- Yoorrook Justice Commission. 2021. "Indigenous Data Sovereignty and Indigenous Data Governance." https://yoorrookjusticecommission.org.au/wp-content/uploads/2022/04/041922_Yoorrook_DataSovereigntyGuidance.pdf.

Appendix A

Reflective questions with guiding prompts using the 6Rs of organisational change (Guerzoni and Prehn 2026).

Questions:	Answer
1. Reflection: Which phase best describes our organisation or data-related entity at present?	
1.1 What evidence tells us we are in this phase?	
1.2 How do different parts of our organisation or community see our current position?	
1.3 Are there areas where we might be straddling more than one phase?	
2. Realisation and resolution: In the short term, what realisations and decisions (resolutions) are needed to establish an Indigenous Data Governance mechanism at the right level	
2.1 What governance structures already exist that we can build on?	
2.2 Who needs to be involved in shaping this mechanism?	
2.3 What risks or barriers might we encounter early on, and how can we prepare for them?	
3. Revision: What are our medium- to long-term goals, and how might these need to be revised over time, for realising Indigenous Data Governance?	
3.1 How do these goals align with our broader aspirations for sovereignty and self-determination?	
3.2 What milestones would signal progress along the way?	
3.3 How will we ensure continuity across leadership and organisational change?	
4. Reconnaissance: What collective strengths do we bring to this work?	
4.1 What skills, relationships, or resources do we already hold?	
4.2 How does our cultural authority and knowledge guide us?	
4.3 In what ways have we shown resilience or innovation in the past that we can draw on now?	
5. Restructuring/responsiveness: What limitations or challenges do we face, and how might restructuring or responsiveness help address them?	
5.1 Where do we lack capacity, skills, or resources?	
5.2 Are there external pressures (e.g., policy, funding, legislation) that restrict our choices?	
5.3 How might we address these limitations while staying true to Indigenous priorities and values?	
