



Responses to questions on notice from hearing 15 December 2021

House Standing Committee on Indigenous Affairs Inquiry into how the corporate sector establishes models of best practice to foster better engagement with Aboriginal and Torres Strait Islander consumers

Reconciliation Australia

December 2021



1. What is the RAP cohort breakdown by sector, especially how deep is the penetration in those sectors where there have been high-profile cases and high-profile complaints?

1. While the focus of the Inquiry is on how the corporate sector engages with Aboriginal and Torres Strait Islander consumers, the RAP program evaluation and the practice of the RAP network underscore that RAP partners from other sectors have a substantial and important impact on the practices of corporate RAP partners, including their engagement with consumers.
2. The 2019 RAP evaluation found that local governments are the most connected with other RAP partners and often advocate for the needs of their residents. University RAP partners conduct important impact analysis and research that drive better RAP outcomes. Government agencies and not-for-profit organisations – including those who have provided submissions or appeared as witnesses in this inquiry – help to identify both positive and negative examples of corporate practice.
3. Government agencies regularly utilise RAPs to drive cultural change in their agencies. Under the *Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy 2020–24*, the Australian Public Service requires the development of a RAP by federal agencies. RAP mandates are also common at the state government level. Approximately 19.5 percent of the 2,080 active RAP partners are government agencies, including 97 federal agencies, 199 state agencies, and 110 local governments.
4. Reconciliation Australia has undertaken targeted outreach to increase engagement in the RAP program. Recent areas of focus include health, technology, and retail. In each case we have deepened engagement by working with existing RAP partners in the sector. We have also directly engaged with organisations that do not currently have RAPs. However, given the current size of the RAP cohort (over 2000 partners) and the exponential growth over recent years, we have limited capacity to undertake individual outreach.
5. Of the existing 2,080 organisations within the RAP network, 958 organisations (46 percent) are private organisations. While not all would be considered “corporate,” the vast majority are for-profit businesses. Below is a breakdown by sector.

Sector	Number of RAP partners
Arts and culture	11
Community development	5
Construction, infrastructure and manufacturing	164
Education and Training	27
Environment and resource management	40
Financial and Insurance	63
Health and medical	43
Legal services	35
Media	19
Mining	39
Other	21
Professional services	235
Property development/management	37
Retail, food, and consumer	50
Science, Technology and Engineering	74
Social Services	11
Sport	31
Tourism	12
Transport	41

6. Notable sectors where there is limited engagement include: tourism; retail and food; and science, technology and engineering.
7. Sectors where there is significant RAP participation include: financial and insurance; and construction, infrastructure and manufacturing.
8. The sectors of interest to the committee not specifically referenced above are telecommunications and provision of funeral services. Telecommunications is included in the construction, infrastructure and manufacturing sector. In that sector – beyond Telstra’s RAP engagement (detailed in our submission) – of the most prominent Australian telecommunications companies: NBN Co has an Innovate RAP, TPG recently launched a Reflect RAP, and Optus is not active in the program. There is no engagement from any funeral organisations in the RAP program.

2. To what extent do businesses that have come to the attention of the regulatory authorities have reconciliation action plans?

9. It is notable that both ACCC and ASIC are existing RAP partners. In ASIC’s submission, they specifically underscore the usefulness of their own RAP journey in enhancing their engagement with, and understanding of, the unique needs of Aboriginal and Torres Strait Islander consumers.
10. Other than Telstra, none of the organisations mentioned in the submissions by the ACCC or ASIC have ever had a RAP.

3. To what extent are customer service issues considered in the endorsement process for organisations that engage with Aboriginal and Torres Strait Islander consumers?

11. As noted in the hearing, the unique deliverables developed by RAP partners (especially those with Innovate, Stretch, and Elevate RAPs) include deliverables focused on impacting their “sphere of influence.” In the diverse array of organisations that engage with the general public, their RAPs include consumer focused deliverables appropriate for their organisational and sectoral context.
12. The RAP framework drives better outcomes for First Nations consumers by building capability within the organisation to identify and address opportunities to improve service delivery and systemic challenges that need to be addressed.
13. Examples of these deliverables include the following:
 - AGL focuses on improving customer access (action 11, p23 of their [2021-2023 Innovate RAP](#))
 - Allianz focused on delivering culturally appropriate services to Aboriginal and Torres Strait Islander customers (action 10, p19 of their [2021-2023 Innovate RAP](#))
 - Bupa commit to promoting a culturally safe environment for customers and undertake to further understand the unique needs of First Nations consumers (actions 8 and 10, pp13-14 of their [2018-2021 Stretch RAP](#))
 - Commonwealth Bank commits to ensure they are equipped to receive feedback from Aboriginal and Torres Strait Islander customers in a culturally appropriate manner; to support teams nationally to develop trusted and respectful relationships with local Aboriginal and Torres Strait Islander customers; and to support Aboriginal and Torres Strait Islander peoples’ financial wellbeing in a culturally appropriate way (actions 3, 10, 21, 22, on pp15, 17, and 20 of their [2020-2022 Elevate RAP](#))
 - TPG undertake to understand customer service needs of Aboriginal and Torres Strait Islander customers (action 10 of their [2021-22 Reflect RAP](#))

- Woolworths undertakes to review racism complaints to determine trends and opportunities to provide intervention and support (p11 of their [2019-21 Innovate RAP](#))

4. What level of churn is there in terms of businesses leaving the RAP program, as well as those joining? Of those that leave, what percentage never come back?

14. As discussed in the hearing, RAP partners choose to disengage from the program for a range of reasons. In some cases, organisations are no longer RAP partners due to mergers or other business changes (for example, machinery of government changes or local government mergers). Beyond those cases, the reasons break down into two categories: (1) passive disengagement and (2) active disengagement.
15. In cases of passive disengagement, the partner does not prioritise reengagement with the RAP program towards the end of their current RAP. They may have continued to pursue various engagement strategies but not in a sustained or strategic way. With increased RAP program capacity and profile, this form of disengagement has become less common in recent years.
16. Active disengagement has occurred in cases where new leadership want to diverge from the RAP framework and “go it alone” with a bespoke Indigenous engagement strategy (or similar). This also sometimes occurs where there is disagreement about appropriate RAP type for the organisation (e.g. they believe they should receive an Elevate RAP while Reconciliation Australia believes a Stretch RAP is more appropriate).
17. There are high profile examples of organisations that disengaged and then returned to the program. These organisations concluded that their organisation would benefit from the RAP framework and the opportunity to learn from the experiences of the RAP network.
18. ANZ, a current Stretch RAP partner, and Woolworths, a current Innovate RAP partner, are two high profile RAP partners that have re-joined the RAP network after a period of disengagement. In the case of ANZ, the disengagement was active, deciding to pursue a bespoke engagement strategy before returning to the program. In the case of Woolworths, the disengagement was more passive, not reengaging with the program after their initial plan expired.
19. The RAP journey is a long-term commitment and there are times when it is appropriate for a RAP organisation to receive an extension, or even pause the development of their new RAP, to enable deeper engagement with Aboriginal and Torres Strait Islander stakeholders.
20. We therefore define active RAP partners as an organisation that meets one of the following criteria: (1) a current endorsed RAP, (2) actively developing a new RAP, and/or (3) a previously endorsed RAP partner that continues to respond to the annual RAP Impact Measurement Questionnaire.
21. There are only 335 organisations that have previously had an active RAP in the 15 year history of the program that have not engaged with Reconciliation Australia in the past two years. Of those, 68 were corporate organisations.
22. In the past 12 months, a total of 104 organisations have reengaged with the RAP program. Eighteen of those organisations were private sector organisations and two were major corporations: Shell Australia (reengaging with the program after an absence since June 2017) and Ausgrid (reengaging after a two-year absence).

5. Suggested CEOs who can talk to the Committee about the way in which having the RAP has changed the culture of their company and about some of the positive steps that they have taken to not just put words in a fine document but to change the culture and engage.

23. Reconciliation Australia has provided a list of organisations to the Secretariat for the Committee to consider engagement with.
24. As Ms. Mundine stated in the hearing, leadership and success in the RAP network includes the ability to identify and learn from mistakes. We offer the following RAP partners not as perfect examples but as partners who have demonstrated leadership and a commitment to ongoing learning:
- Commonwealth Bank of Australia – an Elevate RAP partner who provided a submission to the Inquiry and whose leadership project focuses on educating their staff about strategies to include Free, Prior and Informed Consent in business lending practices with First Nations customers.
 - Wesfarmers – a long-time RAP partner with significant engagement with Aboriginal and Torres Strait Islander consumers. We noted the impact of their BOAB project in our submission.
 - Lendlease – their commercial business, especially shopping centres, includes significant engagement with consumers. As does their new Elevate RAP leadership project focused on truth-telling through place.
25. Given the Committee's specific interest in the experiences of Telstra, Rio Tinto and Woolworths, we believe their leadership would be best placed to speak to what they have learned from their organisation's respective reconciliation journeys.