



AUSTRALIAN GOVERNMENT

**Office of Evaluation and Audit
(Indigenous Programs)**

**EVALUATION AND AUDIT
WORK PROGRAM**

January - June 2005

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FOREWORD

The Office of Evaluation and Audit was established by Section 75 of the *Aboriginal and Torres Strait Islander Commission Act, 1989* as part of the Aboriginal and Torres Strait Islander Commission.

As a result of an amendment to the Administrative Arrangements Order on 24 June 2004, responsibility for the Office was transferred to the Department of Finance and Administration and renamed the Office of Evaluation and Audit (Indigenous Programs) [OEA (IP)].

Pending passage of legislation to establish OEA (IP), a Memorandum of Understanding (MOU) to give effect to the role of OEA (IP) was agreed between the Department of Finance and Administration and key Australian Government Departments responsible for the administration of programs designed to further the social, economic or cultural development of Aboriginal persons or Torres Strait Islanders.

The MOU required the Director of Evaluation and Audit to develop a program for the evaluation or audit of relevant programs administered by Australian Government bodies.

This program, developed in accordance with the MOU, covers evaluations and audits that are in progress or will commence before 30 June 2005.

In March 2005, OEA (IP) was established by Section 193W of the *Aboriginal and Torres Strait Islander Act 2005* (the Act). The Act requires the Director of Evaluation and Audit to develop a program of evaluations or audits before 1 July each year. The first program required by the Act must cover the period ending 30 June 2007. In future years the program will cover a three-year period from 1 July on which it commences

In developing this current program my Office has consulted widely with interested parties and I am grateful for their assistance and contributions.

This program is available on the Office's website on www.finance.gov.au.



Rod Alfredson
Director of Evaluation and Audit

12 May 2005

Part 1

INTRODUCTION

INTRODUCTION

Role of OEA (IP)

The role of the OEA (IP) is to assist in improving the performance and public accountability of the delivery of Indigenous-specific programs.

This is achieved by conducting a regular program of *independent, objective and systematic* evaluations and audits of relevant programs, the particular operations of Australian Government Departments delivering those programs, and the activities of organisations and individuals funded under those programs.

Purpose of evaluations and audits

The aim of the evaluation and audit process is to provide an opinion as to whether inputs, processes and outputs are being achieved in terms of the advancement of Indigenous Australians by Australian Government bodies and funded individuals or organisations. In doing so, necessary improvements to public administration and service delivery will be identified to ensure that objectives are achieved in an efficient, effective, and appropriate manner.

The reviews undertaken by OEA (IP) include performance and assurance audits.

Topic selection criteria

OEA (IP) selects evaluations and audit topics on the basis of the risks involved with the development and delivery of a relevant program and the likely benefits that an evaluation or audit might bring. OEA (IP) adopts a systematic approach to the selection of evaluation and audit topics and takes into account the following factors:

- likely impact from an evaluation or audit;
- risk of the program not performing efficiently and effectively;
- government policy priorities;
- priorities of the Minister for Finance and Administration and the Minister for Immigration and Multicultural and Indigenous Affairs;
- consistency with OEA (IP)'s broad strategic approach;
- previous evaluation or audit coverage by OEA (IP) or other reviewers; and
- financial materiality.

In order to avoid duplication and maximise the value of evaluations and audits, topics are selected in consultation with other Australian Government agencies and other key stakeholders. However, the final decision rests with the Director of OEA (IP).

Proposed evaluations and audits, by Department, are detailed in Part 2 and a summary listing provided in the Appendix.

In addition to this program, the Minister for Finance and Administration may request OEA (IP) to conduct an evaluation or audit of any applicable individual or organisation. The Director may also vary the work program from time to time.

The detailed scope or terms of reference for each evaluation or audit will be determined as part of the individual evaluation or audit planning process.

Strategic environment

The Australian Government provides some \$3.0 billion annually in programs designed to improve the social, economic and cultural development of Indigenous people.

Changed administrative arrangements

The administration of these programs is undergoing substantial change. ATSIC and the Aboriginal and Torres Strait Islander Services (ATSIS) agency were previously responsible for the delivery of many Indigenous-specific programs. These responsibilities have been transferred to mainstream Australian Government Departments with the bulk of the funding spread across eight Departments.

The acquisition of new responsibilities creates challenges for Departments as they come to grips with the added tasks and are required to rearrange their focus and priorities. Such challenges present new opportunities and risks for the delivery of programs in an efficient, effective and accountable manner.

Evaluation and audit focus

Significant change of the kind now in train also presents a problem for evaluation and audit in that many administrative systems and arrangements are likely to change. In such circumstances there is generally little point in auditing arrangements that will soon be redundant unless important lessons can be learnt to improve future program delivery. Consequently, at this time, much of the evaluation and audit emphasis has to be on pro-active audits that assist agencies to administer programs effectively, efficiently, economically and ethically. Hence much of the focus of evaluations and audits will be on ensuring that the design and administrative infrastructure, such as contracts, performance indicators, data collection mechanisms, reporting arrangements etc., is appropriate and operating effectively.

Devolved delivery

As well as Australian Government Departments, it is estimated that some 1500 organisations are involved in delivering services to Indigenous people. These include community housing organisations, Indigenous health centres, native title representative bodies etc. This large number and variety of organisations means that there is a considerable variation in the level of management expertise available to such organisations. This, coupled with differing understandings of public sector accountability requirements, increases the risk programs will not be delivered efficiently and effectively in accordance with public accountability norms.

Consequently, an increased part of the strategic focus of the evaluation and audit program will be devoted to an examination of the activities of non-Departmental organisations.

Government priorities

The Government has indicated that its major priorities in Indigenous affairs are:

- early childhood intervention and improving primary health and early education outcomes, to head off longer term problems;
- safer communities; and
- reducing dependency on passive welfare and boosting employment and economic development in Indigenous communities

The work program has been developed to take account of these priorities.

Relationship with other agencies

OEA (IP) recognises that Secretaries and heads of agencies have a range of responsibilities under the *Financial Management and Accountability Act 1997* and the *Commonwealth Authorities and Companies Act 1997*, including an obligation to ensure the proper use of Commonwealth resources including the administration of Indigenous-specific programs.

The Office of Indigenous Policy Coordination (OIPC) is also a key component of the Government's co-ordination and accountability arrangements for Indigenous programs. It provides policy advice to the Government on Indigenous issues and co-ordinates whole-of-government policy development and service delivery. OIPC also has an evaluation role that focuses on supporting the whole-of-government approach in Indigenous affairs. This responsibility involves independently monitoring the *overall* performance of Indigenous-specific programs and services and preparing annual public reports on the performance of Australian Government programs. The work of OEA (IP) assists OIPC in this regard.

The Auditor-General also has a responsibility to provide assurance on the financial reporting, control and accountability of Australian Government agencies and the performance of programs, including Indigenous programs.

Therefore the functions of OEA (IP) complement, but do not substitute for, the review activities of other agencies. A variety of measures have been put in place to avoid any duplication with the evaluation and audit activities of other agencies.

Reporting

The Office reports on evaluations or audits conducted by it in a manner required by the Minister.

OEA (IP) reports aim to:

- explain the scope and objectives of the evaluation/audit;
- present only findings and conclusions adequately supported by evidence;
- include recommendations for improvement;
- identify issues needing further study or consideration;
- recognise management-initiated improvements; and
- recognise the views of the evaluated/audited body and, where appropriate, state reasons for any disagreement by OEA (IP).

OEA (IP)'s objective is to produce reports that are comprehensible and fair, which present a balanced, consistent perspective and which place primary emphasis on matters requiring attention.

Such reports will make findings and may make recommendations about a program's performance or its financial controls or address issues in a single organisation or across a number of organisations.

Operational protocol and standards

OEA (IP)'s approach to the conduct of evaluations and audits is governed by an Operational Protocol that provides guidance in respect of the liaison and coordination arrangements between OEA (IP) and Australian Government Departments to promote good working relationships.

OEA (IP) will adopt standards and guidelines issued by the professional accounting and auditing bodies, the Australasian Evaluation Society and the Australian Public Service.

Preliminary study

At the commencement of an evaluation or audit, a preliminary study may be carried out to gain greater familiarity with the subject matter and to establish whether or not to proceed with the evaluation/audit. A preliminary study can also assist in refining the scope of the evaluation/audit to ensure the evaluation/audit adds maximum value.

Management of the evaluated/audited body is advised of the purpose of the preliminary study and that a decision will be made whether to proceed with the evaluation/audit in the light of the findings of the preliminary study. At the commencement of a preliminary study, an interview will be sought with officers of the evaluated/audited body at an appropriate senior level of management through the Secretary of relevant Australian Government bodies.

Follow-up evaluations or audits

Some audits may be designated as Follow-up audits to determine if suitable action had been taken in response to the recommendations of a previous evaluation/audit. It is possible that an audit that is begun as a follow-up of specific recommendations may be expanded to a wider audit. If this occurs, the audited body will be informed of the change in scope. Where the evaluated/audited body is a funded individual or organisation, OEA (IP) will inform the Secretaries of relevant Australian Government bodies about the change in scope.

Part 2

EVALUATIONS AND AUDITS BY DEPARTMENT

ATTORNEY-GENERAL'S DEPARTMENT

Audit of Family Violence Prevention Legal Services Program

The Attorney-General's Department presently provides funding for 13 Family Violence Prevention Legal Services (FVPLS) units to assist Indigenous adults and children who are victims of family violence, including sexual abuse, or who are at immediate risk of such violence. Overcoming family violence is one of the Government's priority areas in Indigenous Affairs.

FVPLS units are expected to ensure that the services offered are accessible and culturally appropriate to Indigenous adults and children, in the specified service region, regardless of gender, sexual preference, family relationship, location, disability, literacy or language. The Budget appropriation for FVPLS in 2004-05 is \$7.8 million.

The Government is in the process of doubling the size of the FVPLS program, providing 26 services in rural and remote areas. The expansion program to the additional 13 FVPLS units will cost \$22.7 million over four years. Expanding the services to rural and remote areas will improve the capacity of communities to respond to local needs, provide culturally appropriate responses to family violence and heighten awareness of family violence in the communities. Planning and consultation to identify the location of the new units has been completed. The 13 additional units are expected to be fully operational at the start of 2005-06.

The then Office of Evaluation and Audit reported on an internal audit of the FVPLS program in April 2004. The Department has taken actions to address the issues raised in this report including developing a revised Operational Framework and has been working through individual FVPLS unit issues identified in the Report.

The objective of the audit is to form an opinion on the activities undertaken and the outcomes achieved by the FVPLS program including:

- assessing the actual extent of the implementation of the recommendations contained in the OEA Report issued in April 2004; and
- reviewing the process for determining the location of the additional 13 FVPLS units.

The audit also involves an examination of how efficiently and effectively FVPLS units have administered funding for:

- Legal advice and casework assistance;
- Counselling to victims of family violence and sexual assault;
- Assistance and support to victims of sexual assault;
- Child protection and support;
- Information, support and referral services;
- Community awareness and prevention initiatives;
- Referral to mediation services; and
- Referral to perpetrator programs.

DEPARTMENT OF EDUCATION, SCIENCE AND TRAINING

Evaluation of Indigenous Education Strategic Initiative: Away-from-Base

The Department of Education, Science and Training (DEST) is responsible for a number of programs specifically aimed at improving the educational achievements of Indigenous students from pre-school to university. Expenditure on such programs is expected to be some \$484.9 million in 2004-05. One of the most significant programs is the Indigenous Education Strategic Initiatives Program (IESIP), which accounts for some 38 per cent of total expenditure.

One of the key initiatives funded under IESIP is the Away-from-Base (IESIP-AFB) component. This component has a budget of \$21.7 million in 2004-05 and provides funding to educational institutions to pay for the travel, accommodation and meal costs incurred by students participating in 'mixed-mode' courses. This is a term used to describe courses delivered through a combination of distance education and face-to-face teaching for students who are based in their home communities and need regular on-campus tuition to complement the distance education element of the course.

Educational institutions that access IESIP funding for 'mixed mode' Away-from-Base activities enter into an Indigenous Education Agreement (IEA) with the Australian Government and report against agreed targets and the retention and progression of students enrolled in the courses for which Away-from-Base funding is provided under IESIP.

This component of IESIP has not been specifically evaluated before and an assessment of its contribution to improved educational outcomes for Indigenous students will be consistent with the Government's policy priorities. Such an evaluation will also provide an opportunity to examine the effectiveness of, and compliance with, program guidelines and make recommendations for any necessary improvement.

The draft terms of reference are to:

- review the appropriateness of the 2001-2004 funding with reference to the effectiveness of the IESIP-AFB mixed-mode delivery program on improving educational outcomes for Indigenous students; and
- assess the appropriateness and effectiveness of the Program Administrative Guidelines and the IEAs administered by education providers.

DEPARTMENT OF EMPLOYMENT AND WORKPLACE RELATIONS

Audit of CDEP organisations

There are approximately 230 organisations funded to provide Community Development Employment Projects (CDEP) Program services in 2004-05. These organisations undertake a range of activities to provide employment, business development and community outcomes for Aboriginal and Torres Strait Islander people and their communities.

The CDEP program is administered by the Department of Employment and Workplace Relations (DEWR), with a budget of some \$550 million in 2004-05. Much of this sum is offset against mainstream income support entitlements, which CDEP participants forgo in lieu of a wage for their labour. These funds are granted to CDEP organisations, which then pay participants as though they were employees.

The program makes grants to cover CDEP organisations' recurring costs, including rent, utilities and salaries for administration staff. The program also includes a capital component, which may be granted to CDEP organisations to purchase equipment and to undertake capital works.

CDEP organisations operate in urban, rural and remote locations. In urban areas CDEPs are a major provider of training and employment services. In rural and remote areas, CDEPs undertake important community development work, including the provision of essential services. In some communities, the CDEP is the only source of employment and the only provider of services.

Given the financial materiality involved and the significance of the program in delivering the Government's policy objectives, OEA (IP) proposes to audit the operations of a selection of CDEP organisations in urban, rural and remote Australia to determine whether they deliver their services in an efficient, effective and appropriate manner. OEA (IP) will also consult with CDEP organisations to gain an understanding of the manner in which they interact with Government bodies to determine ways in which these arrangements might be improved and to find better practices that might be implemented elsewhere.

Findings about the operations of individual CDEP organisations will be analysed to determine those factors that facilitate or impede the achievement of training, employment and community development outcomes in various settings. In turn, these findings should provide valuable input to program development, delivery and reform.

DEPARTMENT OF FAMILY AND COMMUNITY SERVICES

Audit of Indigenous Housing Organisations

Community housing services are provided through Indigenous Housing Organisations (IHOs) that are primarily funded through the Community Housing and Infrastructure Program (CHIP). The Budget appropriation for CHIP is \$249 million in 2004-05.

An IHO is any Aboriginal or Torres Strait Islander organisation that manages housing or provides housing support services. It may also be a multi-functional, community services organisation that has a housing related function or unit. IHO's may have several roles including asset and tenancy management, community management, community welfare and municipal services.

According to the 2001 Community Housing and Infrastructure Needs Survey (CHINS), over 600 organisations provide community rental housing and support services for over 21,000 dwellings. Over 16,000 of these houses are located in 1216 discrete communities and the rest in urban settings. Therefore, IHOs play a significant role in the social and economic development of Aboriginal and Torres Strait Islander communities and the capacity of these organisations to effectively and efficiently deliver services is a critical element in improving housing outcomes. The Government's intention to abolish ATSIC has resulted in changed funding arrangements with State/Territories and the transfer of funding administration to the Department of Family and Community Services and State/Territory Governments.

The ANAO reported on an audit of the National Aboriginal Health Strategy (NAHS) aspect of CHIP during 1998-99 and undertook a follow-up audit during 2003-04 to assess the extent to which ATSIS had implemented the recommendations of the 1998-99 audit.

The objective of the audit is to assess the activities undertaken by IHOs funded through the Community Housing and Infrastructure output of CHIP. This will involve an examination of how efficiently and effectively a sample of IHOs are managed and have used funding for:

- capital construction, purchase and upgrade of community owned or managed rental housing;
- general administration costs; and
- repairs and maintenance of existing housing stock where rental income and service charges are not sufficient to meet the costs involved.

Aspects of the reporting arrangements for program outputs and outcomes will also be examined.

Follow-up audit of Third Party Funding Arrangements

Third Party Funding Arrangements (TPFAs) are those arrangements in which a trusted third party holds moneys in escrow pending instructions from Australian Government agencies regarding their disbursement. These arrangements include trust accounts operated by solicitors (including the Australian Government Solicitor) and project managers overseeing major works as well as 'cash at agent' arrangements.

An audit conducted by the then Office of Evaluation and Audit in April 2004 indicated that approximately \$115.6 million of ATSIC or ATSI funds were held in TPFAs.

This amount comprised:	\$m
• Contracted Program Managers	103.0
• Home Ownership Program	2.7
• Business Development Program	2.3
• Other TPFAs	7.6

Whilst OEA had reasonable confidence that the figures provided by ATSI for Contracted Program Managers, the Home Ownership Program and the Business Development Program were soundly based, no detailed testing, including external confirmation of all the information provided, had been undertaken.

Concerns were held with respect to the accuracy of the figure stated for Other TPFAs as conflicting evidence was received as to their total value and there were reasonable grounds to think that this figure may have been understated.

Generally the audit indicated that reporting within ATSI of TPFAs was inadequate with no one area having responsibility for managing TPFAs across ATSI as a whole. With the exception of the Home Ownership Program and the Business Development Program, it was found that computerised management information systems would not allow TPFA balance reporting across the whole of ATSI. It was for this reason that ATSI management had significant difficulty in estimating the value of funds held in TPFAs. Control weaknesses were also noted during the audit that posed significant risks.

With the transfer of Indigenous programs to a number of mainstream agencies it is important money held in TPFAs is recorded accurately and internal controls operate effectively. The objective of the audit is to assess the extent to which the recommendations of the April 2004 audit report have been implemented and the extent of the enhancement to the internal controls in managing TPFAs.

DEPARTMENT OF HEALTH AND AGEING

Audit of Aboriginal Community Controlled Health Services

The Office for Aboriginal and Torres Strait Islander Health (OATSIH) within the Department of Health and Ageing (DHA) has responsibility for administering the Aboriginal and Torres Strait Islander Health Services program.

The program aims to improve access for Indigenous people to culturally appropriate Primary Health Care Services. Funding is provided to a network of Community organisations, mainly the Aboriginal Community Controlled Health Services (ACCHS) organisations.

There are approximately 180 ACCHS organisations throughout Australia receiving funding from DHA. A number of these organisations also receive funding from other sources, mainly from State and Territory Governments.

The DHA's budget allocation for 2004-05 for Health Services in Aboriginal and Torres Strait communities is \$220.8 million.

There have been no specific audits conducted on ACCHS in the past. However, a number of organisations have been the subject of investigations undertaken by DHA.

An audit of a sample of ACCHS provides an opportunity to assess the efficiency and effectiveness of the implementation of a major health program delivering important services to Indigenous people.

OEA (IP) will conduct a preliminary study of ACCHS to identify the risk factors and to determine the detailed objectives and scope of an audit.

Audit of Croc Festivals

Croc Festivals provide an opportunity for Indigenous students living in remote and rural Australia to demonstrate their creative talents by performing in front of a live audience. Performances are held in the evening and daytime activities include health and career expos, sports clinics and creative and performing art workshops. The Festivals encourage young Indigenous students to attend school more regularly and to lead healthy lifestyles and avoid substance abuse.

The Festivals target both primary and high school students and although the Festivals are Indigenous events, non-Indigenous students from remote schools also participate.

The Festivals rely on partnerships between the Australian Government and State/local governments, commercial sponsors and local communities. Local industries also provide strong support, either financially or 'in kind' for these Festivals. A number of Australian Government Departments, co-ordinated by the Department of Health and Aging, provide sponsorship for the Festival with some \$1.7 million being provided for the last Festival. It is estimated that some \$3.0 million is being sought for the next Festival to be held across five sites between July and October 2005.

Given that the successful staging of the Festival relies on complex commercial and financial arrangements involving many stakeholders, concerns have been raised. An audit will examine the reporting arrangements and ensure appropriate record keeping and accounting practices are maintained.

DEPARTMENT OF IMMIGRATION AND MULTICULTURAL AND INDIGENOUS AFFAIRS

Audit of the Torres Strait Regional Authority

The Torres Strait Regional Authority (TSRA) was originally established in 1994 under the *Aboriginal and Torres Strait Islander Commission Act 1989* which was superseded by the *Aboriginal and Torres Strait Islander Act 2005*. TSRA comprises a Board of 20 elected Members supported by an administrative arm of about 26 staff.

The TSRA is responsible for many national and regional programs for people in the Torres Strait, which were previously administered by ATSIC. These include Economic Development, Native Title, Housing and Environment Health Infrastructure, and Social, Cultural and Development.

The TSRA covers all the islands in the Torres Strait as well as the Cape York communities of Seisa and Bamaga and has more autonomy, greater accountability and more powers than the former Regional Council, thus having a greater say in how decisions are made for Torres Strait Islander and Aboriginal people living in the Torres Strait region.

Section 76 of the *Aboriginal and Torres Strait Islander Commission Act 1989* required the Office of Evaluation and Audit to regularly evaluate and audit the operations of the TSRA.

The last audit report issued in November 2004 indicated that, although considerable progress had been made in implementing the audit report recommendations, improvements in a number of areas still required attention.

The aim of the audit is to identify the extent to which the TSRA is operating in accordance with its approved policies and procedures in meeting its accountability obligations; including the identification of any impediments to the implementation of audit report recommendations.

Audit of Native Title Representative Bodies

Responsibility for the *Professional Services to Native Title Claimants* output was transferred to the Office of Indigenous Policy Coordination (OIPC) in the Department of Immigration and Multicultural and Indigenous Affairs on 1 July 2004. OIPC will administer some \$55 million for the Native Title and Land Rights output in 2004-05.

The Native Title program supports native title claimants through the establishment and operation of a network of professional service-delivery organisations known as Native Title Representative Bodies (NTRBs). Representative bodies derive their powers and functions in relation to native title activities from the *Native Title Act 1993* (the Native Title Act) and are eligible to apply for funding from OIPC to undertake those activities.

The Native Title Act sets out a range of functions for organisations, which are selected to operate as representative bodies. These functions involve the provision of support to native titleholders to make various applications under the Native Title Act, including claimant, objection, future act and compensation applications. Representative bodies also have a role

in the negotiation of Indigenous Land Use Agreements, which are voluntary but binding agreements about the use and management of land or water made between one or more native title groups and others (such as miners, pastoralists and governments).

There are currently 15 organisations recognised as representative bodies for particular areas. Taken together, their areas cover the majority of the land mass of Australia. Areas which currently are not covered by recognised representative bodies are New South Wales/ACT, Victoria and Tasmania. Alternative service providers have been funded in New South Wales/ACT and Victoria, but no bodies have sought recognition for Tasmania.

Under the Native Title Act, a representative body must use its best efforts to perform its functions in a timely manner, particularly in respect of matters affected by time limits under the Native Title Act or by time limits under other legislation, which is relevant to the performance of its functions.

A representative body must perform its functions in a manner that:

- maintains organisational structures and administrative processes that promote the satisfactory representation of native title holders and persons who may hold native title in the area for which it is the representative body;
- maintains organisational structures and administrative processes that promote effective consultation with Aboriginal peoples and Torres Strait Islanders living in the area for which it is the representative body; and
- ensures that the structures and processes operate in a fair manner.

It is important that the representative bodies operate efficiently and effectively in accordance with the Native Title Act and other relevant Commonwealth legislation. However, issues have been raised about the operations of some representative bodies.

The objective of the audit is to examine the activities of five organisations that have received funding under the Native Title Program to perform the functions of representative bodies pursuant to the Native Title Act. The audit will examine the administration, corporate governance and performance of the funded organisations to determine whether they perform their statutory functions under the Native Title Act in an efficient, effective and appropriate manner.

SUMMARY LISTING OF EVALUATIONS AND AUDITS

January - June 2005

Department	Title	Evaluation or Audit	In progress	Estimated Completion
Attorney-General's Department	Family Violence Prevention Legal Services Program	Audit	Yes	July 2005
Department of Education, Science and Training	Indigenous Education Strategic Initiative Program: Away-from-Base	Evaluation	Yes	Sept 2005
Department of Employment and Workplace Relations	CDEP organisations	Audit	No	Dec 2005
Department of Family and Community Services	Indigenous Housing Organisations	Audit	Yes	Nov 2005
	Third Party Funding Arrangements	Audit	Yes	July 2005
Department of Health and Ageing	Aboriginal Community Controlled Health Services	Audit	Yes	Nov 2005
	Croc Festivals	Audit	Yes	June 2005
Department of Immigration and Multicultural and Indigenous Affairs	Torres Strait Regional Authority	Audit	Yes	June 2005
	Native Title Representative Bodies	Audit	Yes	Aug 2005