



# ENHANCE AND ENABLE INDIGENOUS KNOWLEDGE CONSULTATIONS 2021

## ACKNOWLEDGEMENT

IP Australia acknowledges the Aboriginal and Torres Strait Islander peoples of Australia. We acknowledge the Traditional custodians and owners of the lands on which our agency is located and where we conduct our business. We pay our respects to ancestors and Elders, past, present and emerging. IP Australia acknowledges Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationship to the land, waters and seas and their rich contribution to society.

Aboriginal and Torres Strait Islander people should be aware that this document may contain names of deceased persons.

## CONTENTS

Consultation Overview .....	3
Consultation Themes.....	4
An Indigenous Panel at IP Australia .....	5
New Measures for Trade Marks or Designs.....	6
Disclosure Requirement for Patents and Plant Breeder's Rights .....	8
Labelling for Authentic Products .....	10
Next Steps .....	11
Background - About the 2021 Consultations.....	12

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# CONSULTATION OVERVIEW

From 23 February to 31 May 2021, IP Australia sought feedback on four options to enhance Australia's IP system to support Aboriginal and Torres Strait Islander people to benefit from and protect their Indigenous Knowledge (IK).

## We asked...

## We heard...

## What's next?

### An Indigenous Panel at IP Australia

Who should be on a Panel?	<ul style="list-style-type: none"> <li>• Real authority and decision making in partnership with IP Australia about IP applications that include IK</li> </ul>	IP Australia to develop a partnership model for shared decision making that will be released for public comment
What should a Panel do?	<ul style="list-style-type: none"> <li>• Indigenous members with mixed expertise</li> <li>• Can't represent all regions or nations, but can help empower elders, people and community</li> </ul>	

### Measures for Trade Marks and Designs

What checks should be done regarding IK in a trade mark?	<ul style="list-style-type: none"> <li>• Consultation and consent is key</li> <li>• Everyone should say if they are using IK and why</li> <li>• IK should only be used in a business' IP if they are working in partnership with IK owners</li> </ul>	Proposals to be developed for potential system changes to ask about, and respond to, IK in trade marks
How should it be identified if IK is being used?		Application form to be reviewed so people can advise upfront that they are using IK

### Disclosing use of IK in Patents and Plant Breeder's Rights

What should the focus of a disclosure requirement be?	<ul style="list-style-type: none"> <li>• Support for disclosing use of IK</li> <li>• Consent, access and benefit sharing and acknowledgment are important</li> <li>• Penalties should get people to do the right thing, but shouldn't burden Indigenous applicants</li> </ul>	IP Australia will develop proposals to put a disclosure requirement into the patent system and look at options in the plant breeder's rights system
How should use of IK in inventions be acknowledged?		

### Labelling for Authentic Products

Should there be labelling schemes for authentic products?	<ul style="list-style-type: none"> <li>• Doesn't stop inauthentic products</li> <li>• Can disadvantage creators who cannot, or choose not to engage with the scheme</li> </ul>	IP Australia will continue its input into the scoping study for stand-alone legislation for the protection of IK
What sort of labelling might work?	<ul style="list-style-type: none"> <li>• Can help tell the story of products' connection to country</li> <li>• Resources needed to set up a scheme can be a barrier</li> </ul>	IP Australia will share information with businesses interested in labelling schemes

# CONSULTATION THEMES

In addition to what we heard on the four consultation topics, a lot of other important and broader issues were raised with IP Australia. This is useful feedback for us and will also inform our approach.

## Two Different Worlds

One reoccurring theme is that when talking about IK and IP, we are talking about two different knowledge systems. Trying to bridge them can be difficult. We need to be careful that we don't make changes which inadvertently harm or impact Indigenous culture. IK is a key part of Aboriginal and Torres Strait Islander identity.

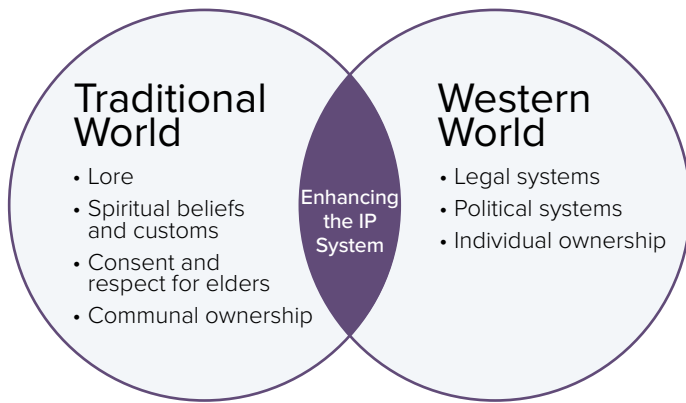


Figure 1: Adapted with permission from diagram shared at Cairns Focus Group by Gabriel Bani, Cultural Consultant.

## Holistic Protection Needed for IK

There was a lot of support for stand-alone legislation to protect IK. Stand-alone legislation could provide an overarching framework that ties into the patchwork of existing laws to provide better protection for IK.

## Consultation and Consent

Some common themes arose around consultation and consent. Consent was seen as going back to the 'source', finding the right Elders, organisation, community, family or person to get permission.

Stakeholders recognised the complexity and limitations of defining consent processes for all communities and nations. It was noted that IP applicants should be working with community if they want to use IK. Stakeholders advocated for IP Australia to design and deploy an agile, adaptable process for consent, one that recognised the cultural and organisational diversity of Aboriginal and Torres Strait Islander Australia and that they could engage with at different levels or in different ways.

## Education and Awareness

Another consistent theme was the importance of increased education and awareness as part of any proposed changes. This included the need for increased information for communities and owners of IK about the IP system. There was a need for education to support people in understanding what IP can and can't protect, as well as the impact of consenting to the use of IK in a commercial or IP context. Related to that, more tools are needed to help people negotiate consent agreements, contracts or access and benefit sharing arrangements that involve their IK.

It was also raised that applicants for IP rights will need more education around using IK. There would need to be guidance for non-Indigenous applicants on how to approach getting free, prior and informed consent (FPIC), including how to contact appropriate sources of authority.

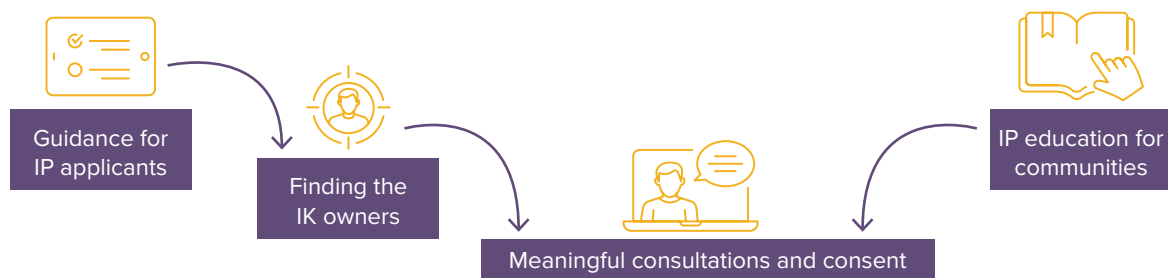


Figure 2: Education and guidance needs for consent as raised in consultations.

# AN INDIGENOUS PANEL AT IP AUSTRALIA

IP Australia sought feedback on having an Indigenous Panel to provide an independent voice for Aboriginal and Torres Strait Islander perspectives to IP Australia.

## Summary of feedback

Stakeholders supported this initiative. Feedback emphasised the importance of a Panel that connected back to community and sources of cultural authority. However, stakeholders did not support a model where a Panel attempted to represent or make decisions on behalf of all Aboriginal and Torres Strait Islander people (Wurundjeri). The Panel should not be a “tick box” that does not influence decisions (DACC).

There were mixed views as to whether the Panel should be representative of diverse Aboriginal and Torres Strait Islander perspectives, given the challenges in doing so. The preference was a Panel of experts that connected in with community and used existing place-based peak bodies, land councils and language and art centres.

Stakeholders emphasised the importance of shared decision-making and providing meaningful authority to a Panel, in addition to the relevant cultural authority or Traditional Owners and custodians where matters concern IK (IERG, NSWALC, SBS).

An Indigenous Panel to IP Australia could have a role in consideration of evidence regarding consent. However, stakeholders noted that there can be significant time and resources needed in considering the circumstances around uses of IK. Applicants should also have responsibility for seeking consent, rather than putting this on the Panel (AIATSIS).

The consultations also identified the importance of IP Australia building trust at the grass roots level in order to support the Panel to achieve its functions and role (IERG).

## IP Australia response

IP Australia will consider a Panel based on a partnership model which supports [Priority Reform One - Formal partnerships and shared decision-making](#) from Closing the Gap. This model would involve inputs from a Panel, Traditional Owners and custodians, and IP Australia’s decision makers.

Based on feedback, the functions of a Panel would include:

- advising on strategy and policy to support Aboriginal and Torres Strait Islander peoples to commercialise and benefit from their IK
- helping to advise on applications for IP rights that contain IK
- engaging with Aboriginal and Torres Strait Islander communities about their IK.

To support the above model, IP Australia will investigate options to embed Aboriginal and Torres Strait Islander perspectives in decision-making. This may include having a register of contacts across Australia to help connect with the right people to speak on IK. We will work with our Indigenous Expert Reference Group (IERG) to develop a draft model for consultation.



Figure 3: Partnership Model for a Panel will link input from different sources.

# NEW MEASURES FOR TRADE MARKS OR DESIGNS

IP Australia sought feedback on measures to enhance the trade marks and designs systems where people are seeking IP protection over IK in circumstances that Aboriginal or Torres Strait Islander peoples would find inappropriate, unfair or offensive.

**“Using words and imagery is also about identity, there is a link. When IK is being used there are three important aspects – consulting, getting consent and appropriate attribution.”**

**Focus Groups**

## Summary of feedback

Issue	Consultation Feedback
<p><b>New checks in trade marks or designs</b></p>	<p>Overall there was support for new checks relating to the use of IK in trade marks or designs. Stakeholders were keen for checks related to whether IK is being used appropriately in accordance with cultural protocols (SBS), and stopping non-Indigenous people trading off culture. While offensive use of IK was also a problem, many stakeholders saw consultation and consent in accordance with cultural protocols as the way to address this. However, there is some secret and sacred IK that should not be used or monopolised.</p> <p>Consultation and consent were strongly supported when IK is being used (NSWALC, AIATSIS, VACCA). Focus group discussions highlighted that a consent-based requirement should apply to Indigenous and non-Indigenous applicants, and that in cases where consent is needed, and there is no evidence of any consultations, the application should not proceed. Several responses supported the development of a best-practice approach or standard for demonstrating free, prior and informed consent for use of IK (NSWALC, SBS, VACCA).</p> <p>Stakeholders stressed the need to work with community to ensure greater understanding about commercial tools such as IP and the implications of giving consent for others to use IK (NSW Young Lawyers).</p> <p>Some stakeholders saw risks and complexities in a consent focused approach (Bowery, Handler and Aoun, DACC, Wurundjeri), because consent or consensus might be difficult to obtain. Part of this relates to the fact that no one person will hold exclusive rights over IK (DACC). There was some support for being able to demonstrate other kinds of relationships and credible engagement. Further, solely focusing on a consent requirement could place stress on vulnerable people without knowledge of trade mark law and without access to legal advice (Bowery, Handler and Aoun).</p> <p>A further point was that flexibility within the system would be needed. This would help reflect that concepts like ownership and consent can be understood in different ways between the western and traditional worlds. For example, consent can be withdrawn at any time and IK ownership can be shared.</p>
<p><b>Additional application questions about IK</b></p>	<p>There was stakeholder support for changing the trade mark and design application forms to require all applicants to state upfront if they have used IK, in order to deter misappropriation (LCA). Having mechanisms to provide for recognition of the relationships of Traditional Owners to IK and appropriate attribution was also seen as important.</p> <p>Where IK is being used in an application, stakeholders supported IP Australia asking questions in order to understand if the applicant is using knowledge from their own community, or has consent. These requirements were not seen as burdensome.</p>
<p><b>Research into use of IK</b></p>	<p>Focus groups discussed how translation into English may change or misrepresent the true meaning of words, which can cause offence. Engagement with language holders and language centres on use of IK in IP right applications was considered critical to understand the context and meaning of a word.</p>
<p><b>Tools to find out about IK in trade marks and designs</b></p>	<p>While stakeholders showed some support for having more information in trade mark and design applications containing IK, there were concerns about collating applications in a database. Some stakeholders recommended a co-design process with Aboriginal and Torres Strait Islander peoples for further exploration of such a tool. If information was to be published, there was support for some sort of advertising in the Koori Mail and/or other Aboriginal and Torres Strait Islander media, not just in IP Australia’s IP Journals.</p>

## IP Australia response

IP Australia will develop measures to reflect the importance of consent and consultation when IK is used in trade mark and design applications. We will consider new processes to support recognition and respect for decision-making about IK by Traditional Owners and custodians. We will also consider how to avoid additional burdens on Aboriginal and Torres Strait Islander peoples.

As next steps, IP Australia will look to:

- develop more detailed proposals for potential system changes to create a new check or 'ground for rejection' that allows IP Australia to ask for information about the circumstances surrounding any proposed use of IK in a trade mark
- better identify applications that contain IK by updating application forms so applicants can state upfront if they are using IK
- explore legislative or other changes to assist in considering relevant evidence when IK is being used in a design, given that the designs examination process is different to that for trade marks.

If system changes are agreed, IP Australia will also create additional guidance material for applicants on a standard for consent and consultation to support this.

IP Australia will also investigate what could be done to co-design tools to help Traditional Owners to locate potential use of their IK in IP applications.

# DISCLOSURE REQUIREMENT FOR PATENTS AND PLANT BREEDER'S RIGHTS

IP Australia sought feedback on a new disclosure requirement when genetic resources or traditional knowledge have been used to develop an invention or new plant variety. Consultation questions asked about what disclosure would be required and when, and what the main aim of disclosure should be.

**“Plants come from country - the eating, harvesting and use of plants is done with permission”**

**Focus Groups**

## Summary of feedback

Issue	Consultation Feedback
<p><b>A requirement to disclose the source of a genetic resource or traditional knowledge for a patent</b></p>	<p>There was overall support for a disclosure requirement with the burden to be placed on applicants rather than Indigenous people. The preference was for disclosure of a genetic resource or traditional knowledge to link back to the original source. We heard that disclosure should cover things like what country a plant was grown on, and by whom. This included identifying the person who was consulted or who gave authority relating to the use of the genetic resource or traditional knowledge, whether an Elder or someone else. Some stakeholders also thought that disclosure should extend to where information is used which is publicly known or published in a book.</p> <p>Concerns about inadvertently publishing IK as part of a public document, the inability to respect confidentiality and data sovereignty were raised.</p> <p>It was clear from the feedback that disclosure alone won't fully address all concerns about use of genetic resources or traditional knowledge in patents. More education and support is needed to support disclosure and help ensure the consequences of sharing IK are clear to communities.</p>
<p><b>Introducing penalties for non-disclosure</b></p>	<p>Some Aboriginal and Torres Strait Islander stakeholders supported introducing penalties as a deterrent to inequitable exploitation of IK. There was support for remedies or penalties when IK was directly part of an invention, and it appeared that an applicant knew this and deliberately did not disclose the source. The range of views on this topic included:</p> <ul style="list-style-type: none"> <li>• Fines, transfer of ownership or royalties to remedy misuse were some of the sanctions suggested</li> <li>• Where sanctions are insignificant, they may just be absorbed as the cost of business and an ineffective deterrent</li> <li>• On the other hand, there were concerns that strong penalties such as invalidating or revoking a patent for non-disclosure may discourage researchers from engaging with IK owners</li> <li>• Additionally, there were concerns that revocation would mean that IK owners could no longer derive benefit from the patent.</li> </ul> <p>Some noted Indigenous applicants should not be penalised if they do not have the resources or knowledge on how to comply with a disclosure requirement (NSWALC).</p>
<p><b>Encouraging disclosure in patents</b></p>	<p>Various stakeholders preferred a requirement focused on transparency and encouraging disclosure but there were mixed views. Some legal and university stakeholders preferred a transparency focus to take into account that applicants may have difficulties in some cases identifying the source of a genetic resource or that their invention had used IK. It was also felt that an opportunity to update or correct source information should be provided (Universities Australia).</p> <p>Penalties like invalidating a patent were considered inappropriate by these stakeholders where the applicant's failure to make an accurate disclosure did not materially contribute to the grant of a patent.</p>
<p><b>Disclosure for plant breeder's rights</b></p>	<p>There was overall support for disclosure of source of traditional knowledge for PBR with similar feedback to patents.</p>



## Consent and Access and Benefit Sharing (ABS)

Concerns were raised that a failure to engage with IK owners can cause spiritual and cultural damage, and result in lost economic opportunities (Dr Wright). There was stakeholder support for the ability to attach information on ABS or consent to IP rights. Some considered that consent should be a critical element of IP applications. Evidence could be in the form of a statutory declaration or written agreement lodged as part of an application. Ongoing compliance with such agreements was also raised as an important consideration.

One view was that a disclosure requirement should be designed to supplement and support consistency with state-based ABS laws and the Nagoya Protocol (P Marshall). There was a suggestion that parties should have the ability to request redaction of information about traditional knowledge before this is made publicly available (NSW Young Lawyers).

Education for communities that supports them in giving free, informed and prior consent and in reaching ABS agreements was stressed as well.

## IP Australia response

IP Australia will use this feedback when considering how to introduce a disclosure requirement. IP Australia seeks to encourage the acknowledgment of Aboriginal and Torres Strait Islander peoples as the owners and custodians of IK and the key role they should have in IK-based innovations.

IP Australia will consider how to balance the different views on when disclosure should be required and how remedies or penalties could apply. The intent of the disclosure requirement will need to be balanced against unintended effects such as increasing the burden on Traditional Owners and Elders, making the process more difficult or uncertain for businesses or inventors, or creating a barrier to benefits flowing back to community.

The next steps for IP Australia will be:

- creating more detailed proposals for system changes to require applicants to disclose or declare the source of a genetic resource or traditional knowledge when used in developing a patent, including what remedies or penalties may be appropriate for non-compliance
- considering mechanisms to require applicants to disclose the source of traditional knowledge associated with the development of their new plant species
- improving the information we provide, to empower applicants to disclose the source of IK or genetic resource. For example, links to ABS resources, guides for forming partnerships, or obtaining FPIC.

# LABELLING FOR AUTHENTIC PRODUCTS

IP Australia sought Indigenous businesses' and creators' views on whether they saw a labelling scheme as a useful tool to indicate authenticity of products. IP Australia consulted directly with artists, producers, and businesses from a range of sectors around the country.

## Summary of feedback<sup>1</sup>

There was overwhelming support for efforts to reduce the sale of inauthentic products. However, in practice, many stakeholders felt that a national labelling scheme for authentic Indigenous products could place an unfair burden on Aboriginal and Torres Strait Islander creators.

The major concerns with a new labelling scheme for authentic products were:

- a labelling scheme does not provide legal redress for the sale of inauthentic products which causes cultural harm
- it could be difficult or divisive to reach consensus or attempt to regulate what constitutes an authentic product
- a requirement to prove Aboriginal or Torres Strait Islander identity would be disempowering for some creators. People might not always have access to proof of identity
- if a fee is required to use a Certification Trade Mark (CTM), this could preclude certain creators from opting into the scheme
- those who cannot, or choose not to, engage with a labelling scheme could be disadvantaged and potentially assumed to be producing inauthentic products.

Feedback on a labelling scheme was mixed according to different sectors of the community. Unsuccessful past attempts at a labelling scheme for authentic art have created hesitancy for this approach, along with the considerable support expressed for protection through stand-alone legislation for IK or laws to prohibit the import and domestic sale of inauthentic Indigenous products in Australia.

There was more interest in a labelling scheme such as a certification trade mark or geographical indication from stakeholders in the traditional or bush foods sector to recognise the connection between products and country. Funding and capacity were raised as a key barrier to establishing CTMs, as it takes time and resources away from running a business (First Nations Bushfood Alliance).

The role of technology was also raised. IP Australia has been involved in a pilot using Smart Trade Mark technology with the Indigenous Land and Sea Council and the Northern Australia Aboriginal Kakadu Plum Alliance. Smart Trade Mark allows consumers to verify a trade-marked product through a blockchain authenticated supply chain. Through this pilot, IP Australia heard interest in a certification scheme from the businesses involved. IndigiLedger also brought to attention its work with its partners to develop a world leading Indigenous blockchain and Smart Retail Technology platform to address counterfeit Indigenous culture. Platforms and technologies like this which are ready to be deployed to Indigenous businesses and communities, and these technologies could be explored further.

## IP Australia response

Differences in the structure of supply chains and markets for authentic goods, from consumables to high-end art products, mean a nation-wide model for labelling does not seem appropriate.

IP Australia will continue to have conversations and share information with those producers in the traditional or bush foods sectors with an interest in labelling based on the certification trade mark system.

On broader concerns about inauthentic products, IP Australia will continue to support separate consultations focused on stand-alone legislation for IK protection in 2022. More information about this work is [available online](#).

<sup>1</sup> IP Australia also considered relevant input to the consultation on *Growing the Indigenous Visual Arts Industry* undertaken in 2020 by the Office for the Arts at the Department of Infrastructure, Transport, Regional Development and Communications.

# NEXT STEPS

IP Australia will continue to seek feedback as we progress our IK work. The next steps that IP Australia will take, guided by the consultation feedback are:

## **Bridging the two worlds**

- Continued input into a [scoping study into stand-alone legislation](#) to protect IK, including further consultations on this in 2022
- Developing a draft terms of reference for an Indigenous Panel at IP Australia and we will release publicly

## **Enhancing existing IP systems**

- Developing proposals for further consultation, including on a new ground for rejection for trade marks, and a new disclosure requirement for patents and plant breeder's rights
- Developing further guidance, particularly on consent, for those looking to take a best-practice approach to using IK in an IP right (including guidance on any system change)
- Considering updates to the IP Australia application systems to prompt disclosure from applicants on whether they are using IK when filing for IP protection
- With Aboriginal and Torres Strait Islander stakeholders, co-designing new tools to help IK owners identify new IP applications where someone might be using their IK

## **Support to access to IP systems**

- Develop educational material for Aboriginal and Torres Strait Islander communities on IP
- Continue to have conversations and provide information to interested stakeholders about the certification trade mark system and how it could be used for labelling authentic products

A new IP Australia IK work plan reflects our upcoming work.

We always want to hear from you. Please email [IKProject@ipaustalia.gov.au](mailto:IKProject@ipaustalia.gov.au) to get in touch. We also send regular email updates to our [IK Updates mailing list](#).

# BACKGROUND - ABOUT THE 2021 CONSULTATIONS

This round of consultations ran from February 23 to May 31, 2021 and we received:

- 13 nonconfidential written submissions
- 1 confidential written submission
- 45 survey responses
- 40 participants at focus groups
- 62 Webinar attendees
- 3 members of IP Australia's Indigenous Expert Reference Group

We connected with Traditional custodians, Indigenous business owners, academics, and other stakeholders. IP Australia has considered all the submissions, conversations, emails and phone calls in putting together this report and thanks all stakeholders who took the time to engage with us.

## Consultation Approach

IP Australia used several avenues to raise awareness about our IK consultations, including social media and advertisements in the Koori Mail to get the word out and connect with new people.

There was a range of options for providing feedback, beyond just written submissions. Our goal was for the consultations to also be a way to share more information about the IP system.

We held focus groups to speak with people directly and worked with Indigenous Consultancy, NintiOne to set these up. Although the COVID-19 pandemic made it difficult to hold many focus groups, the ones that went ahead were a vital part of our consultations. We are keen to come back, in person when we can, to continue the conversations.

Our online survey was designed to give those who might be busy, whether working in community organisations or running their business, a short form way to provide us their views. We also set up phone calls with people who reached out to us to speak about our consultation topics.

Our consultations also included two webinars to connect with people while sharing information about how IP and IK interact and the considerations for businesses. These webinars are still available online:

- Webinar 1 – [Indigenous Knowledge: Opportunities in the IP System](#)
- Webinar 2 – [Developing Your Unique Brand: First Nations Language and Art](#)

IP Australia knows that seeking out Aboriginal and Torres Strait Islander views is key to progressing our IK work and we are always looking to get better at how we consult and engage. If you have any feedback on our consultations, please send it to us at [IKProject@ipaaustralia.gov.au](mailto:IKProject@ipaaustralia.gov.au).

Indicative Categories of Stakeholders Engaged

Stakeholder Categories	Face to Face	Written Submissions	Online Survey
Indigenous Businesses	10	2	8
Indigenous Peak Bodies or Other Organisations	17	2	5
Academics and Lawyers	10	6	11
Artists or Other Creative Industries	3	1	5
Other	4	2	16

## List of Written Submissions and Acronyms

This report summarises all the feedback we received in our consultations. Non-confidential submissions are available on the IP Australia website and this report notes in places where the commentary reflects comments in those submissions with bracketed references. The feedback summary is not limited to only the responses from written submissions.

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

Dreamtime Art Creative Consultancy (**DACC**)

Dr Evana Wright (**Dr Wright**)

IndigiLedger

Kathy Bowery, Michael Handler, Fady Aoun (**Bowery, Handler and Aoun**)

Law Council of Australia (**LCA**)

New South Wales Aboriginal Land Council (**NSWALC**)

NSW Young Lawyers (**NSW Young Lawyers**)

Paul Marshall (**P. Marshall**)

Special Broadcasting Service (**SBS**)

Universities Australia (**UA**)

Victorian Aboriginal Child Care Agency (**VACCA**)

Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation (**Wurundjeri**)