



Report 5: 2024-25 | 21 November 2024

PERFORMANCE AUDIT

Implementation of the Aboriginal Procurement Policy



Office of the Auditor General for Western Australia

Audit team:

Jason Beeley
Jeremy Bean
Kim Payne
Andrew Harris
Chris White

National Relay Service TTY: 133 677
(to assist people with hearing and voice impairment)

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ISSN: 2200-1913 (print)
ISSN: 2200-1921 (online)

The Office of the Auditor General acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.

WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT

**Implementation of the Aboriginal
Procurement Policy**

Report 5: 2024-25
21 November 2024

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**THE PRESIDENT
LEGISLATIVE COUNCIL**

**THE SPEAKER
LEGISLATIVE ASSEMBLY**

IMPLEMENTATION OF THE ABORIGINAL PROCUREMENT POLICY

This report has been prepared for submission to Parliament under the provisions of sections 24 and 25 of the *Auditor General Act 2006*.

Performance audits are an integral part of my Office's overall program of audit and assurance for Parliament. They seek to provide Parliament and the people of WA with assessments of the effectiveness and efficiency of public sector programs and activities, and identify opportunities for improved performance.

This audit assessed if State government entities' implementation of the Aboriginal Procurement Policy is supporting positive outcomes for Aboriginal communities consistent with value for money in procurement.

I wish to acknowledge the entities' staff for their cooperation with this audit.

A handwritten signature in black ink, appearing to read 'Caroline Spencer'.

Caroline Spencer
Auditor General
21 November 2024

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Auditor General's overview

Economic participation through employment and business ownership is one of the most effective ways to empower people, including vulnerable and disadvantaged groups. The National Agreement on Closing the Gap reflects this, with a target that seeks to achieve the strong economic participation and development of Aboriginal people and their communities. WA's Aboriginal Procurement Policy (APP), overseen by the Department of Finance (Finance), aims to make an important contribution to achieving this target.



The policy has been in place for six years and focuses on increasing opportunities for Aboriginal businesses to contract with State government entities. While there has been success, arising from a genuine embrace of the policy by many government entities we audited, more is clearly possible to demonstrate it is achieving its objectives in contributing to closing the gap of disadvantage in our State.

Overall targets for the share of qualifying contracts going to Aboriginal suppliers have been met and there has been growth in the number and value of contracts with Aboriginal businesses. The current target is 4% of contracts above \$50,000. However, these results are driven by a small number of large entities such as Main Roads WA exceeding their targets while many entities, including my own Office, are not consistently meeting or have never yet met their targets.

The spread of contracts across industry sectors does not reflect the general patterns of government procurement and is skewed towards sectors with large numbers of lower skilled workers like construction, cleaning and security services. This indicates limited success in encouraging greater diversity among Aboriginal businesses and upskilling of Aboriginal workers. Targets for subcontracting and employment are not being effectively tracked, and neither are broader economic and social impacts for Aboriginal people and communities. This in part reflects the narrow nature of the policy in focusing on contracting opportunities. Evaluation of available evidence of how those contracting opportunities affects broader socio-economic outcomes for Aboriginal people and communities has not yet been undertaken.

I have made recommendations for all procuring entities, and for Finance as policy owner, to consider in developing the policy further. I acknowledge that entities have to balance requirements of the APP with many other procurement obligations, including under the *Financial Management Act 2006*, the *Public Sector Management Act 2006* and the *Procurement Act 2020*. These pieces of legislation require public entities to operate in a manner that is efficient and effective and promotes best value for money in government procurement. Finance will need to be cognisant of that in making the policy more effective without also making it too complex and onerous. However, both procuring entities and Finance can do more to ensure that APP builds on results so far and delivers on the ultimate objective of reducing the gap of disadvantage for West Australian Aboriginal people and communities in the future.

Executive summary

Introduction

In 2018, the WA Government introduced the Aboriginal Procurement Policy (APP) for a term of three years. Its aim was to ‘increase contracting opportunities for Aboriginal businesses, therefore supporting employment and business opportunities’ by setting progressive annual targets for State government entities (State entities). The policy was reviewed and amended in 2021 for a second three-year term.

Various stakeholders have expressed significant interest in this topic, noting difficulties defining Aboriginal business and applying the APP alongside other policies such as value for money. This audit asked if State entities’ implementation of the APP is supporting positive outcomes for Aboriginal communities consistent with value for money in procurement.

To answer this, we audited the Department of Finance (Finance) as the policy owner, and four contracting entities: Main Roads WA and the Departments of Planning, Lands and Heritage, Training and Workforce Development, and Communities. We also consulted a range of stakeholders, including Aboriginal business organisations.

Background

The APP is a general procurement direction (2021/08) that applies to all government entities as defined by the *Procurement Act 2020*. There are 170 entities to which the APP technically applies. Operationally, only around 130 procure their own goods and services. Entities whose administration is managed by another entity such as a department, and advisory bodies in the form of boards and committees, are not expected to meet procurement targets. Universities, government trading enterprises (GTEs) and port authorities are, by this definition, exempt but the GTEs apply the policy voluntarily. Progressive targets aim to increase the number of WA government contracts awarded to registered Aboriginal businesses, and mandates Aboriginal participation requirements for certain contracts.

The APP’s targets were based on those adopted by the Commonwealth government in its Indigenous Procurement Policy. These targets took the form of percentages of the number of qualifying contracts entered into by each State entity:

- 1% in 2018-19
- 2% in 2019-20
- 3% in 2020-21.

Near the end of the first three-year term, Finance conducted a policy impact review. It reported that targets were being achieved by the sector as a whole and the APP was achieving its primary purpose. However, less than 50% of State entities were meeting the targets individually at that time. The review made recommendations that informed the second three-year term of the APP to 30 June 2024.

The targets were increased for the second three-year term to:

- 3% in 2021-22
- 3.5% in 2022-23
- 4% in 2023-24.

Targets were also introduced for subcontracting and employment in contracts valued above \$5 million in particular industries where a contract is to be delivered predominantly to, or targets specific needs of, Aboriginal people.¹

To meet targets, entities must post contracts on Tenders WA, which only records contracts worth \$50,000 or more. This means only contracts worth \$50,000 or more have been counted towards targets.

Contracted businesses are considered to be Aboriginal if they are registered by the Aboriginal Business Directory WA (ABDWA), managed by the Chamber of Commerce and Industry WA and Industry Capability Network WA, or Supply Nation, a national body funded by membership fees and Commonwealth grants. Since December 2023, Aboriginal Community Controlled Organisations (ACCOs), as defined by the Delivering Community Services in Partnership (DCSP) policy, have also been counted towards entities' APP targets.

The APP's outcomes should contribute to achieving one of the national Closing the Gap targets, strong economic participation and development of Aboriginal and Torres Strait Islander people and communities. WA is a signatory to the National Agreement on Closing the Gap.

Conclusion

The APP has been partially effective in providing opportunities for Aboriginal businesses to supply to State entities and supporting employment and economic development for Aboriginal communities. The number and value of contracts with Aboriginal businesses has increased since the APP was introduced, and the State Government overall has met the policy target each year since its introduction in 2018. However, this is based on the strong performance in procurement practices of a few large State entities in particular, while the majority have either not consistently met targets or have never met them. Thirty entities met their target in 2023-24.

Contracting is also unevenly distributed across industries, being heavily weighted towards building and facility maintenance and heavy construction. This pattern does not reflect the overall balance of government spending and highlights gaps in sectors with more specialised skills like IT, where very few contracts are held with Aboriginal businesses. There are indications of a positive impact on Aboriginal employment, but this has not been effectively tracked or evaluated even though participation requirements were included in the policy in 2021-22.

Value for money assessments should consider both financial and non-financial components. However, as these were not always measured or documented for the procurements we examined under the policy, it is not possible to determine if value is consistently achieved in accordance with the policy objectives and more generally. When they are undertaken, value for money assessments can include pricing adjustments that discount the cost of Aboriginal contracts for comparison purposes. While these pricing adjustments are consistent with the aims of the policy to support Aboriginal businesses and can help entities meet their policy targets, the increase in procurement costs needs to be adequately justified on the grounds of the policy objectives, which may include, for example, specific support for economic participation in disadvantaged remote Aboriginal communities. As the policy matures, focusing on value for money and the social outcomes achieved takes on added significance.

While there are now more Aboriginal businesses working with government entities, the extent to which the policy has grown the Aboriginal business sector is unclear. The Supply Nation and ABDWA registries show growing numbers of registered businesses and offer a practical way to identify Aboriginal businesses, but they are not exhaustive as some businesses are not listed on the registers. Furthermore, there are areas of unmet demand from State entities to engage with Aboriginal businesses, especially in the health, community and social support sectors. This is

¹ Department of Finance, [General Procurement Direction 2021/08 - Aboriginal Procurement Policy](#), Finance website, 1 December 2021, accessed 19 November 2024.

particularly acute in remote locations where there is competition from the resources sector for such services. Recognising ACCOs under the APP from December 2023 is intended to support this.

The impact of the policy more broadly on business capability development, and wider community and social benefits, have not yet been measured because policy implementation continues to focus strongly on contracting opportunities. As central policy owner, Finance needs to better assess and understand these broader impacts to inform future iterations of the policy. More wholistically demonstrating the costs and benefits, and encouraging those State entities and service sectors that are not yet meeting the targets, will help further achieve the policy's aims and enhance its impact in directly supporting Aboriginal economic participation.

Recommendations

1. Contracting entities should:
 - a. consider ways to increase direct engagement with Aboriginal businesses and improve compliance with Aboriginal participation requirements
 - b. review their procurement strategies and processes to ensure they are not unduly onerous for potential suppliers who are seeking to work with Government for the first time, having regard to relevant legislative and policy requirements, including a focus on appropriately using the flexibility in the policy to support Aboriginal suppliers
 - c. ensure value for money assessments adequately assess financial and non-financial value for money considerations and are well documented, particularly when direct procurement or restricted tenders are used
 - d. consider ways to assess the broader impacts of their procurement from Aboriginal businesses, e.g. by post-project review surveys and evaluations.

Implementation timeframe: By 30 June 2025.

Main Roads WA response:

- a. In the 2023-24 financial year, 39 of 196 contracts were awarded to registered Aboriginal businesses.
- b. Main Roads has had in place for some time, simple short forms of contract which adequately cover relevant legislative and policy requirements, which have contributed to the above successes.
- c. Main Roads has documented processes with respect to value for money assessments when directly engaging Aboriginal businesses, and price preferences for Aboriginal businesses on panel contracts when issuing packages of work, and price preferences when Aboriginal people are being proposed for the package of work.
- d. Main Roads is currently undertaking a review of the social impacts from the delivery of the Fitzroy Bridge project.
Main Roads recently awarded a Panel Contract for the Provision of Training and Business Capability Support Services for Aboriginal Businesses and Peoples, available to the Transport Portfolio, which aims to provide training and support in the following areas:
 - Procurement and Tendering
 - Commercial Management
 - Financial Management
 - Establishing Management Systems
 - Civil Construction
 - Technical Services.

Department of Communities response:

- a. Communities is pleased with its achievements against the Aboriginal Procurement Policy targets since the inception of the policy. Communities acknowledges the continual need to consider and support the direct engagement with Aboriginal businesses.
Timeframe: Ongoing
- b. Communities acknowledges the recommendation to review its procurement strategies and processes and is committed to considering this when developing its procurement strategies for procurement activity. The ACCO Commissioning Framework will also support this recommendation.
Timeframe: Ongoing
- c. Communities acknowledges the recommendation to ensure value for money assessments adequately assess financial and non-financial value for money and are well documented. It will review procurement artefacts and consider increased visibility of the value for money assessment. It will review its internal guidelines for opportunity to enhance support for determining value for money in procurement activity.
Communities will also consider ways to assess the broader impacts of its procurement from Aboriginal businesses and the completion of its goods and services procurement activity with Aboriginal Businesses.
Timeframe: April 2025
- d. Communities will continue with its current approach of undertaking evaluations on services that are commissioned.
Timeframe: Ongoing

Department of Training and Workforce Development's response:

The Department of Training and Workforce Development supports the recommendations for Contracting entities.

2. The Department of Finance should consider ways to enhance the overall impact of the APP by:
 - a. improved monitoring of the Aboriginal participation requirements
 - b. assessing the wider impact of the APP on the Aboriginal business sector and communities through policy evaluation
 - c. encouraging new Aboriginal businesses and actively supporting capability development in a greater diversity of industry categories
 - d. simplifying the tendering process for suppliers and accelerating the evaluation of tenders to reduce costs and the time between tender and award for small businesses engaged on lower value contracts.

Implementation timeframe: By 30 June 2025

Department of Finance's response:

Finance accepts three of the recommendations in full. Finance partially accepts the recommendation to consider ways to encourage new Aboriginal businesses and actively support capability development in a greater diversity of industry categories as business development is not within the remit of the Finance portfolio.

Response from the Department of Finance

The Department of Finance appreciates the opportunity to participate in the Office of the Auditor General's audit of the Aboriginal Procurement Policy.

Finance acknowledges the findings of the audit. The findings provide a useful contribution to Finance's ongoing work to improve the operation and effectiveness of the Aboriginal Procurement Policy.

Response from Main Roads WA

Main Roads is committed to the State Government's implementation of contracting opportunities for Aboriginal businesses and supporting positive employment and business outcomes. The agency is pleased to see the positive results from the performance audit and the use of Fitzroy Bridge Alliance as the case study and has no concerns with the report findings.

Response from the Department of Communities

The Department of Communities has valued the opportunity to be a participant in the performance audit of the Effectiveness of the Aboriginal Procurement Policy conducted by the Office of the Auditor General. The Department acknowledges the findings and recommendations provided in the report and will consider these in all aspects of future procurement and contract management activity.

Communities is currently developing an ACCO Commissioning Framework, in consultation with the Council of Aboriginal Services WA and the Aboriginal Health Council of WA. The framework is intended to guide the commissioning of community services that are culturally appropriate and support an increase in the number of ACCOs providing services to the community.

Communities continues to provide education and communication to its teams on the Aboriginal Procurement Policy to ensure this is considered upfront in the planning of procurement strategy.

Response from the Department of Training and Workforce Development

The National Agreement on Closing the Gap contains a number of socioeconomic outcomes and associated targets, of which four are related to the training and workforce development portfolio. Closing the Gap is also a national priority under the National Skills Agreement (NSA) and an important aspect of delivering on this priority is embedding reforms in both the National Skills Plan and State/territory action plans (in development).

The NSA provides for a step-change in governments' approach to delivering on Closing the Gap commitments for skills, with dedicated investment and concrete action to ensure that the design and delivery of VET to First Nations Australians is in full and genuine partnership.

The NSA commits to enabling investments to support Closing the Gap. Bilateral Implementation Plans (BIP) must also be developed in partnership with First Nations communities and organisations to release Commonwealth funds to contribute to the achievement of Closing the Gaps targets including:

- Activities to expand investment in the capability, sustainability, and growth of the Aboriginal Community Controlled and First Nations Owned training sector (Closing the Gap Priority Reform 2)

- Activities to grow the First Nations VET workforce and boost cultural competency of mainstream RTOs (Closing the Gap Priority Reform 3).

To address the above, the Department is working towards establishing partnership and codesign arrangements, including direct financial investment in Aboriginal Community Controlled Organisations and Aboriginal Registered Training Providers to support capability and engagement in co-design processes.

Additionally, the Department's Reconciliation Action Plan (RAP) published in September 2021 outlines actions for achieving our vision for reconciliation and aims to imbed and continuously improve our cultural capacity. RAP Action 3.3 — Increase Aboriginal and Torres Strait Islander supplier diversity to support improved economic and social outcomes is relevant to the audit recommendations for Contracting entities with deliverables including:

- Reviewing and improving the Department's procurement strategies to support the engagement of Aboriginal and Torres Strait Islander owned businesses
- Developing and communicating opportunities for procurement of goods and services from Aboriginal and Torres Strait Islander businesses
- Maintaining commercial relationships with Aboriginal and/or Torres Strait Islander owned businesses and registered training organisations
- Meeting the WA Aboriginal Procurement Policy contracting targets.

These deliverables were addressed in the last 12-18 months, however the above are acknowledged to be an ongoing process. The RAP Procurement Reform Sub-committee established as part of the Department's RAP continues to meet regularly to identify further strategies and opportunities for continuous improvement.

The need to address value for money in the decision-making process is noted and is considered to be incorporated in our procedures.

Response from the Department of Planning, Lands and Heritage

We are pleased to have been able to contribute to this audit and welcome any opportunities to strengthen the effectiveness of the policy and subsequently support employment and economic development for Aboriginal businesses and communities.

As discussed in the Summary of Findings, it is often difficult for agencies to balance the outcomes of the Aboriginal Procurement Policy (APP) with the fundamental procurement requirements of achieving value for money. The non-financial benefits of contracting with Aboriginal businesses are often difficult to quantify and imposing additional provisions into the procurement process to better define these benefits (such as requiring suppliers to detail the employment outcomes the engagement would achieve for instance) would add to the length and complexity of the process which is already difficult for many Aboriginal businesses to participate in.

Additional guidance as to how agencies should assess these benefits in the APP guidance material would be useful. It would also need to be cautious not to increase the complexities of the procurement process further to risk deterring Aboriginal suppliers from engaging in these processes. Additionally, if the onus for demonstrating value for money based on non-financial and sometimes intangible benefits becomes too high on agencies there is the potential that engagement of Aboriginal businesses will decrease as the opportunities the APP provides to streamline their engagement may diminish.

Audit focus and scope

This audit assessed the effectiveness of the implementation of the APP which came into effect from 1 July 2018 for an initial period of three years. The aim of the APP was to create more opportunities for Aboriginal businesses to supply State entities with goods and services. It was based on the nationwide Indigenous Procurement Policy adopted by the Commonwealth Government as one of suite of measures designed to contribute to Closing the Gap between Aboriginal and non-Aboriginal Australia. The APP was revised for a second three-year period ending on 30 June 2024. Further extension of the APP, including potential revisions, is currently being considered.

The audit focused on Finance as the entity responsible for administering the APP. In addition to interviewing staff and reviewing documentation, we had full access to Tenders WA, which Finance used to measure performance against targets, and to its Aboriginal procurement dashboard. The dashboard was not public during conduct of the audit.

The audit period was 2018-19 to 2023-24. However, complete data for 2023-24 was not available to audit at the time of reporting. Where it was not available, data to 2022-23 was used.

The audit included four other State entities and reviewed a sample of contracts they had entered into with Aboriginal businesses. These entities were chosen because their contracts represented a broad range of industry, value, duration and location. They were:

- Main Roads WA
- Department of Communities
- Department of Planning, Lands and Heritage
- Department of Training and Workforce Development.

We also interviewed representatives of the following stakeholders:

- Department of the Premier and Cabinet
- Waalitj Hub
- Supply Nation
- Aboriginal Business Directory WA
- Laing O'Rourke.

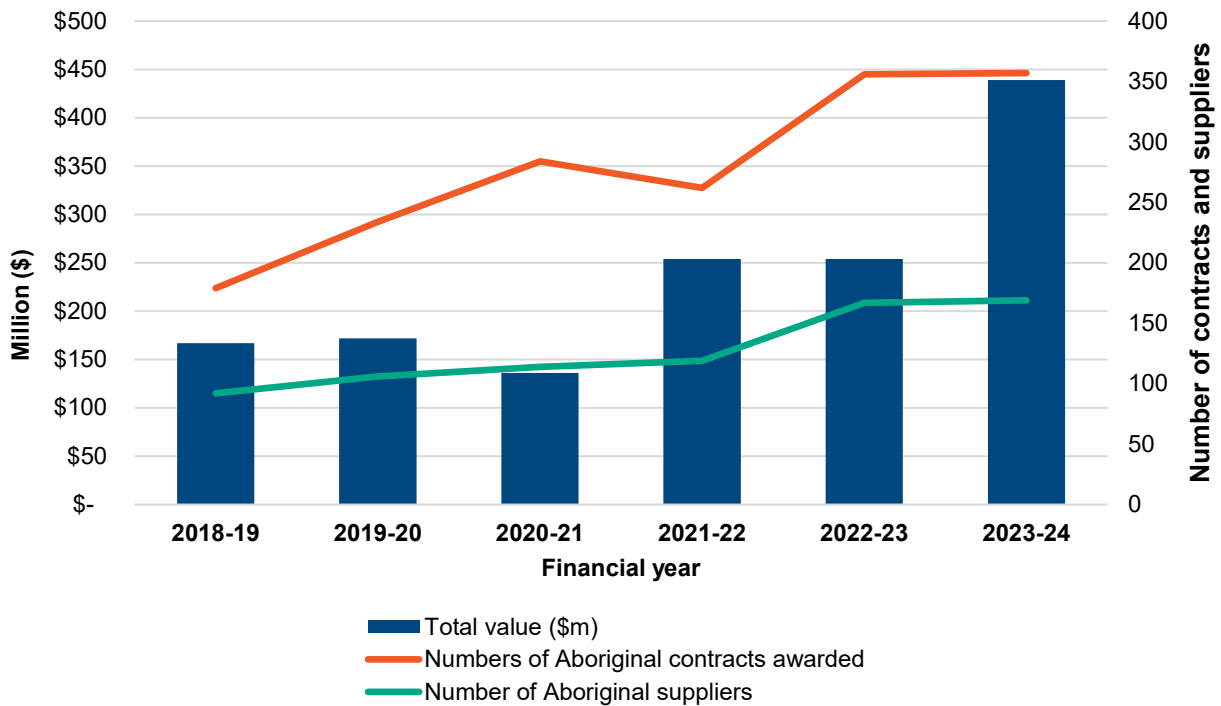
This was an independent performance audit, conducted under section 18 of the *Auditor General Act 2006*, in accordance with Australian Standard on Assurance Engagements ASAE 3500 *Performance Engagements*. We complied with the independence and other ethical requirements related to assurance engagements. Performance audits focus primarily on the effective management and operations of entity programs and activities. The approximate cost of undertaking the audit and reporting was \$331,000.

Findings

The policy has been partially effective at supporting the Aboriginal business sector

The number and diversity of contracts with Aboriginal businesses has grown significantly since 2018 but they are heavily skewed towards the works category

The number of qualifying contracts, that is contracts valued at more than \$50,000 and registered on Tenders WA, between State entities and Aboriginal businesses has doubled under the APP, from 179 in 2018-19 when the APP commenced to 357 in 2023-24 (Figure 1).



Source: OAG using Finance data

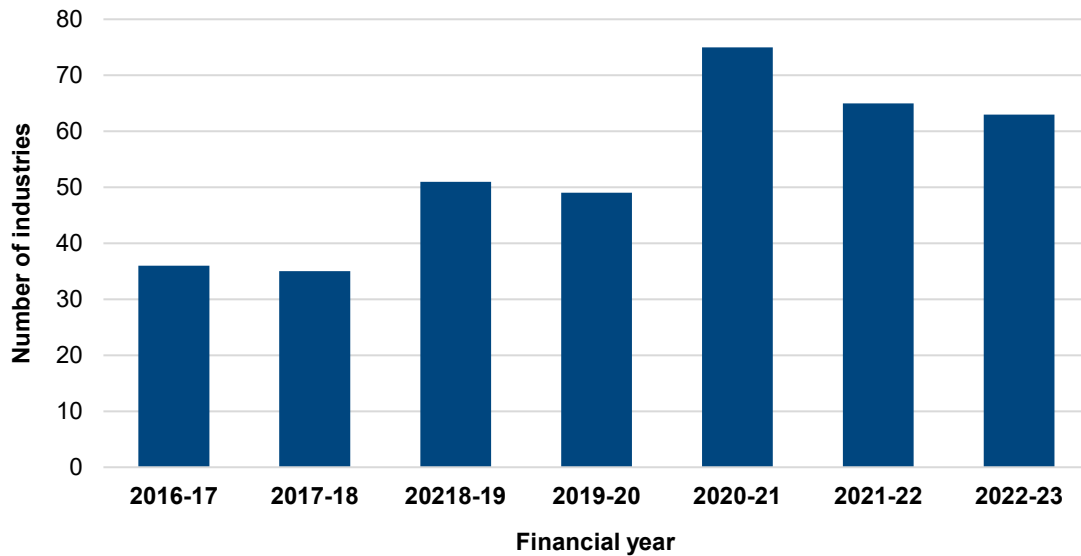
Note: contracts are recorded in the year they were awarded but may cover several years of work.

Figure 1: Number and value of Aboriginal contracts awarded

The trend in average contract value across the years is flat. This means the upward trend in the total value of qualifying contracts has been driven by the increase in the number of contracts.

The increase in economic diversity measured by the number of industries in which contracts were made is also significant, though this has fallen slightly since 2021. Contracts were executed in 35 categories in 2017-18, rising to 75 in 2020-21 before falling to 63 in 2022-23² (Figure 2).

² Complete data for 2023-24 was not available to audit at the time of reporting.

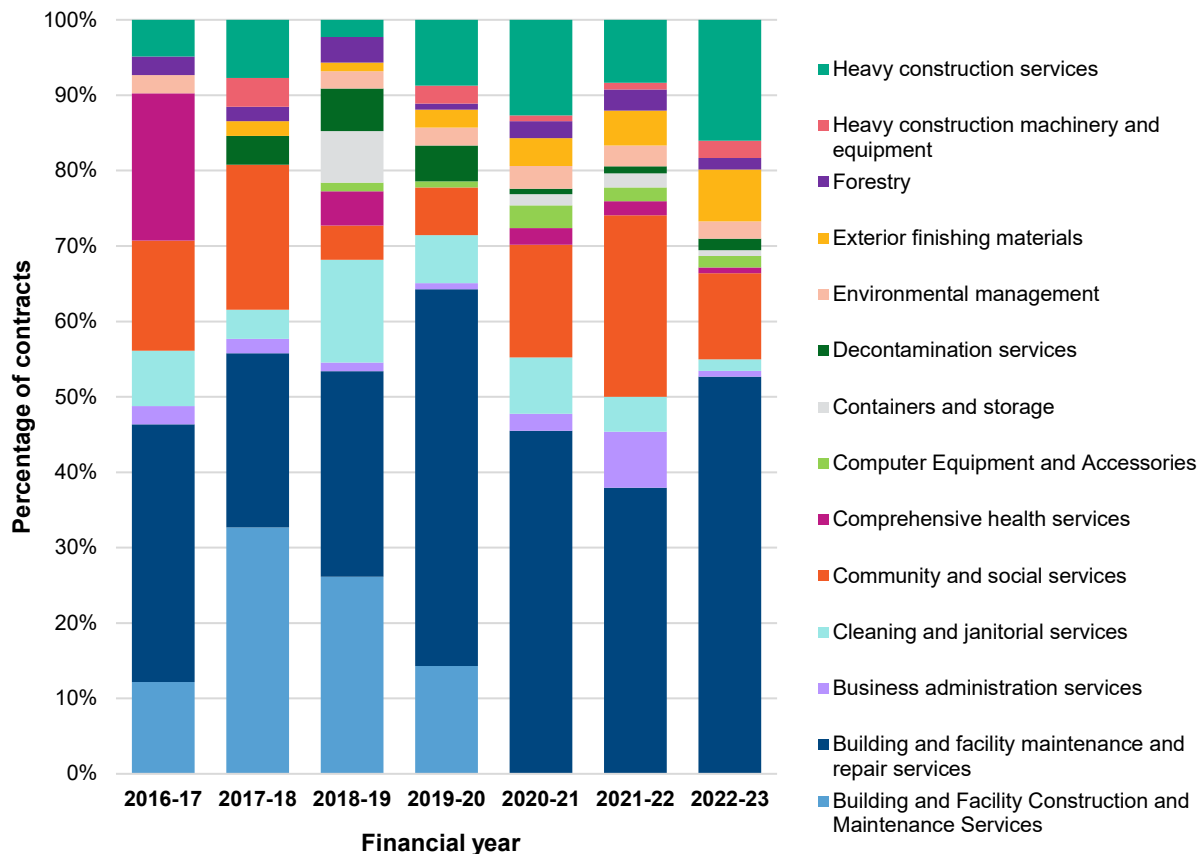


Source: OAG using Finance data

Figure 2: Numbers of different industries contracted by year

However, the distribution of Aboriginal contracts differs markedly from that of the State sector as a whole. Over the three years to 2022-23, the number of contracts has skewed heavily towards industries in the works category (52% vs 25% for the whole State sector) and away from industries in the goods and services category (42% vs 73%). Over that time, Aboriginal businesses were awarded 3.5% of goods and services contracts compared with 12.9% of works contracts while only four contracts were awarded to Aboriginal businesses for ICT services out of a total of 2,257. In 2023-24, 54% of Aboriginal contracts were in the works category against 38% in goods and services and 9% in community services. This is a clear indication that APP benefits to Aboriginal business development are not evenly spread. It also suggests there may be scope for greater engagement with Aboriginal businesses in the goods and services category.

Finance has not assessed the impact of the policy on skills development, but areas of contracting may give some indication. A large proportion of contracts with Aboriginal businesses by number (42%) and value (61%) were in industries that employ low or unskilled labour. These include heavy construction services, building and facility maintenance services and cleaning and janitorial services (Figure 3). While contract diversity increased during the first three years of the APP, it has plateaued since then and these categories have remained dominant.



Source: OAG using Finance data

Note: industries with fewer than 10 contracts since 2016-17 have been removed.

Figure 3: Aboriginal procurement is dominated by building and facility maintenance and heavy construction

Finance provides some support for building capability in business management as generic support for businesses to start and succeed. To this end, it engages two Aboriginal contractors: Morrgul in the north and mid-west of the state and Waalitj Hub in the south. This kind of support has been identified as a common need, especially among small Aboriginal businesses with less experienced owners and staff. However, there are no measures in the APP specifically aimed at increasing skills across the Aboriginal workforce, no assessment of the existing skills base and little sign of growth outside the industry sectors that have dominated in recent years.

Only a small minority of entities are achieving their Aboriginal procurement target

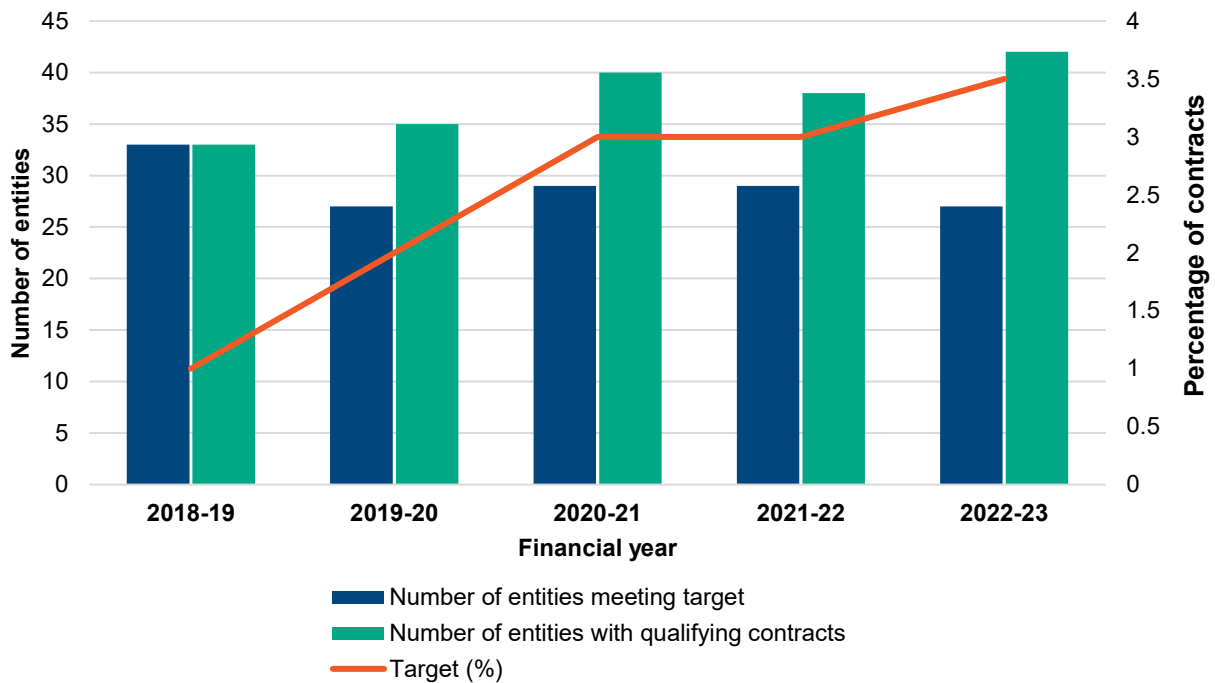
While the sector overall has exceeded targets for numbers of contracts each year (Table 1), this was achieved on the basis of strong performance by a few large entities while the majority have either not consistently met targets or have never met them. The 2023-24 APP Performance Report states that, of 357 contracts awarded to Aboriginal businesses that year, 211 (59%) were signed by just three entities: Main Roads WA (98), the Department of Communities (55) and the Department of Education (58).

Year	Target (% of contracts)	Sector performance (% of all contracts)
2018-19	1%	4.77%
2019-20	2%	5.55%
2020-21	3%	6.45%
2021-22	3%	5.60%
2022-23	3.5%	6.86%
2023-24	4%	6.54%

Source: Finance

Table 1: Sector performance against targets

Only 30 entities (23% of the 130 procuring entities) met their Aboriginal procurement targets in 2023-24. After 33 entities reached their targets in 2018-19, the first year of the APP when the target was only 1% of contracts, the number reaching targets has been steady, with 27 in 2019-20, 29 in 2020-21 and again in 2021-22 as the target was raised and falling again to 27 in 2022-23. At the same time, the total number of entities with qualifying contracts in any one year has been trending up (Figure 4).



Source: OAG using Finance data

Figure 4: Entity performance against targets to 2022-23

In overseeing the policy, Finance has decided that compliance is not practical or relevant to the operations of entities that award small numbers of contracts. Entities in this category include:

- entities for whom the total number of contracts or their size make expectations of compliance unrealistic
- entities that procure goods and services under their own legislation and do not use Tenders WA
- committees whose administrative support is provided by other entities which procure on their behalf and record the procurement against their own targets

- wholly owned commercial businesses
- charitable foundations.

This left 49 entities in the 2023-24 financial year for which compliance was realistic and expected.

Entities not meeting targets have missed them for a variety of reasons, including because they procure through other larger entities, they have not contracted through Tenders WA, they have highly specialised requirements or because they have not issued a sufficient number of contracts in total for the result to be meaningful.

State entities that have not met targets range from large entities such as the Department of Fire and Emergency Services, the Department of Primary Industries and Regional Development and the Public Transport Authority to smaller entities that are either highly specialised or rarely issue large contracts. Finance publishes these results in an annual performance report³. The 2023-24 performance table is at Appendix 1.

Finance's annual performance report for 2022-23 lists 18 entities that met the reporting benchmark⁴ but did not meet target. These entities issued a combined total of 1,928 contracts valued at \$50,000 or more but only 37 (two per cent) of them to Aboriginal businesses. Six of these entities issued no contracts at all to Aboriginal businesses in 2022-23 despite issuing between them 244 contracts valued at \$50,000 or more.

Finance has not reported entity performance against the subcontracting and employment targets introduced in 2021 because it has concerns about how entities are understanding and applying these components of the policy and is investigating the issue. These targets apply to contracts valued at or above \$5 million that are in key industry sectors or are either delivered predominantly to Aboriginal people or target the specific needs of Aboriginal people. They require contractors to either subcontract a percentage of the total contract value to Aboriginal businesses or ensure Aboriginal people make up a specified percentage of their workforce. These requirements vary across regions, with the highest targets in the Pilbara and Kimberley.

Using Tenders WA to measure performance against the targets relies on self-reporting by entities. Based on that data, Finance compiles a regular report for the Minister for Finance and maintains an online dashboard showing qualifying contracts and their values for each State entity. It plans to make the dashboard public but is yet to do so.

Finance requires entities to confirm their Tenders WA data before reporting it in *Who Buys What and How* and this confirmation is signed by the entity's accountable authority. Finance considers this enough assurance for the purposes of the APP.

Finance provides written guidance on complying with the APP to both State entities and Aboriginal businesses and business groups and issues an annual report summarising the results.

Finance has identified a range of reasons why entities did not meet targets

Finance surveys all participating entities and meets with a sample to understand their reasons for not meeting the target. Common reasons include that entities are unable to identify Aboriginal suppliers that they believe have the necessary capacity, capability, skills or understanding, or that their contracting is too infrequent or small scale to meet targets. Poor value for money was cited three times in Finance's survey of 75 entities. While all these explanations may be reasonable, the survey responses are often short on detail, are not independently verified and there are no consequences or incentives to do better.

³ Department of Finance, [Aboriginal Procurement Policy Performance Reports](#), Finance website, n.d., accessed 19 November 2024.

⁴ Entities that awarded fewer than 17 contracts overall and none to Aboriginal businesses have not been reported.

According to the survey results, entities not meeting the target were more likely to attribute their performance to:

- specialised buying requirements
- not enough Aboriginal businesses with the required capability
- lack of response from Aboriginal businesses to contracting opportunities
- difficulty meeting Aboriginal subcontracting or employment targets for contracts with Aboriginal participation requirements
- lack of support from the Finance
- not enough value for money in Aboriginal tenders.

However, they were also more likely to:

- say they get sufficient internal executive support
- have nominated an APP implementation champion
- identify suitable Aboriginal businesses in the planning stage
- have set Aboriginal procurement targets beyond those set by APP
- have implemented process or template changes in response to the APP.

These results suggest State entities are making efforts to comply with policy but see the constraints preventing them from doing so as outside their control.

There were two areas of the survey where entities who were meeting targets stood out. These entities were more likely to:

- have limited buying opportunities (fewer than 10 contracts per year) and therefore only need one Aboriginal business contract to meet their target
- have introduced pricing preferences for Aboriginal businesses.

Pricing preferences or price adjustments are used by some entities to ensure Aboriginal businesses are competitive in open tender.⁵ For example, a 10% price adjustment would discount a tender from an Aboriginal business by 10% when evaluating it alongside competing tenders. Price adjustments are included in value-for-money assessments discussed below.

The way performance is measured understates State entities' engagement with Aboriginal business by not counting small contracts

The way that APP performance targets are measured mean that they understate the State sector's engagement with Aboriginal business. Performance targets only include contracts listed on Tenders WA which excludes contracts worth less than \$50,000, many with smaller or newer businesses. Subcontracts also do not count towards an entity's overall performance target though they may count toward its participation targets. Multi-year contracts are only counted in their first year.

For the first four and a half years of the APP, contracts with Aboriginal Community Controlled Organisations (ACCOs) were largely overlooked when measuring performance against the APP targets because very few were registered as Aboriginal businesses with ABDWA or Supply

⁵ Department of Finance, [Aboriginal Procurement Policy Agency Practice Guide](#), Finance website, 1 June 2019, accessed 19 November 2024.

Nation. This changed in December 2023 after an ACCO definition was included in the Delivering Community Services in Partnership (DCSP) policy. ACCOs are community-based not-for-profit organisations that can be engaged to deliver services to Aboriginal communities. The Department of Communities has developed a strategy⁶ and database of 1,095 ACCOs to do this and contracts under this strategy now contribute to its APP target.

In the case of panel contracts where the Aboriginal business on the panel does not carry out the work, the contract is counted against the target but a value is not assigned. This situation is rare, however, with fewer than five instances in any year.

For entities such as the Department of Training and Workforce Development that prioritise multi-year contracts for long-term sustainability and capability development, the targets do not fully reflect their substantive engagement because such contracts are only recognised in the year they are signed.

Both ABDWA and Supply Nation have been open to ACCOs but the numbers that have registered are not available. Only eight businesses have identified themselves as ACCOs on the ABDWA registry but there could be others that have not specified that status in their profile. The Supply Nation database does not include ACCOs as a possible identifier. Enabling ACCOs to be identified on Tenders WA creates a more accurate picture of Aboriginal suppliers to State entities.

Entities need to better document their procurement decisions

The registries managed by Supply Nation and ABDWA are not exhaustive but offer a practical way to identify Aboriginal suppliers

Registration by Supply Nation or ABDWA offers a straightforward way for State entities to identify a business as Aboriginal for the purposes of the APP. Both registries^{7,8} explain on their websites how they determine a business is Aboriginal and the processes they use to ensure ongoing reliability for those using their registers, including independent auditing of samples of businesses. Finance provided a grant to the Industry Capability Network WA in 2023-24 to better audit Aboriginal businesses registered with ABDWA and enable State entities to check on their audit status.

Both registries update their listings of Aboriginal businesses on a monthly basis. Supply Nation reports that it removes 30-50 businesses Australia-wide each month from its register for a variety of reasons, including they cease trading or there is a change of ownership. ABDWA reported 192 businesses added and eight removed between February 2022 and December 2023. This shows that both registries take steps to maintain currency and that their registries are subject to a process of review. Our audit did not assess the reliability of these processes.

Not all Aboriginal businesses choose to register with Supply Nation or ABDWA. Their reasons include the view that these registries are not Aboriginal because they are not run by Aboriginal organisations and that they allow a box-ticking approach to meeting procurement targets. The inclusion of joint ventures and partnerships where Aboriginal people do not exercise a controlling interest is also controversial, but the participation of Aboriginal businesses in this registration system is widespread and growing.

⁶ Department of Finance, [Aboriginal Community Controlled Organisation Strategy 2022 to 2032](#), 3 August 2022, accessed 19 November 2024.

⁷ Supply Nation, [How we verify Aboriginal and Torres Strait Islander businesses](#), n.d., accessed 19 November 2024.

⁸ Chamber of Commerce and Industry and Industry Capability Network WA, [Aboriginal Business Directory WA](#), n.d., accessed 19 November 2024.

Rigorous assessment of value for money was not documented in 30% of the procurements from Aboriginal businesses we tested

The entities we audited include value for money in their standard tender procedures and templates for all procurement, including Aboriginal procurement, but evaluations did not always address it explicitly. Tender evaluations did not address value for money at all in four (10%) of the 39 contracts in our sample while another eight (20%) provided only basic statements that tenders were value for money or gave no reasons beyond price or Aboriginality alone. While all these contracts might represent value for money, the lack of detailed assessments during the procurement process creates a risk that value cannot be demonstrated for the procurement and has the potential to undermine the policy.

An open tender process played a part in value for money assessments in 18% of procurements in our sample

Open tenders can help achieve value for money by exposing contract opportunities to the greatest number of potential suppliers and choosing the most competitive tender. Open tenders were used for seven (18%) of the contracts in our sample (Table 2). Other options for Aboriginal procurement include restricting tenders to Aboriginal businesses and direct sourcing that allow even large contracts to be offered without completely open competition. Restricted tenders can retain some of the benefits of open tender if well-managed, while direct sourcing must rely solely on direct evaluation by the procurement team.

Method	No.	Comment
Open tender	7	Competitive pressure supports value for money
Restricted tender – multiple respondents	17	Limited competitive pressure
Restricted tender – single respondent	5	Limited competitive pressure
Direct sourcing	5	Relies on entities understanding the market
Unsolicited proposal	1	Relies on entities understanding the market
No information	5	

Source: OAG

Table 2: Procurement approaches in Aboriginal procurement

Value for money assessments can include price adjustments but these are not always needed to enable Aboriginal businesses to compete for contracts

Value for money assessments in procurement can include pricing adjustments, including for Aboriginal businesses. These involve discounting the cost of a contract by a fixed percentage before assessing it against other procurement criteria. As applied to Aboriginal procurement, their purpose is to support Aboriginal business competitiveness and they may come with obligations. For example, the extra cost of an Aboriginal contract may be expected to cover training or other support costs for Aboriginal staff. In this way it is seen as adding value by developing the business and addressing Aboriginal disadvantage, thereby providing value for money in delivering all the outcomes sought in the procurement.

We identified five contracts from two entities where a pricing adjustment was applied for Aboriginal businesses during contract evaluation. One entity applied 10% and the other 15%. For all other contracts no pricing adjustment was applied.

For some contracts in remote locations, the Aboriginal business may be the lowest cost tenderer even without a price adjustment because it is based near where the supply is needed. Part of this advantage is the ability to minimise travel costs for workers and management while local knowledge and community connections facilitate the works. For example, a Main Roads

WA contract was issued to an Aboriginal business whose offer price was lower than the competition because it was located near the works. The contract was a panel contract for road construction in 2021. There were five tenders, with an Aboriginal business submitting the lowest price and winning the contract.

Main Roads WA allows a 15% cost adjustment when buying directly from an Aboriginal business but not when they are responding to a public tender. The 15% allowance enables support services for Aboriginal employees to be included in the contract price without affecting the value for money assessment. This can include such supports as childcare or transport to enable employees to attend a work site.

Pricing adjustments may result in entities paying more for goods and services on occasions, while securing other outcomes. This offers scope for them to improve their performance under the policy and is consistent with the policy aims and procurement rules. Our analysis of entity survey data provided by Finance showed that pricing adjustments may have a positive effect on performance against APP targets. None of the agencies who were not meeting targets have introduced adjustments, while 25% of agencies who are meeting targets have introduced them. This suggests there is scope for State entities to do more to meet their targets by implementing pricing adjustments notwithstanding this may lead to increased costs for some goods and services procured through Aboriginal businesses.

Evidence from contract evaluations and willingness of contracting entities to repeat engagements indicate Aboriginal businesses are delivering on their contracts

The rate of repeated engagement of Aboriginal businesses, the size of their contracts and references in tender evaluations to past performance indicate that Aboriginal businesses are completing contracts at satisfactory levels of quality and timeliness for an acceptable cost. Sixty seven percent of contractors engaged prior to 2022-23 secured repeat contracts, with individual contract values ranging from \$50,000 to \$65 million.

The entities we audited were aware of the written guidance Finance provides on value for money criteria and which is publicly available online.

Entities do not consistently document all steps in the procurement process to ensure decisions are consistent and capable of review

When reviewing each contract, we expected to see documentation that confirmed:

- the procurement initiation included consideration of Aboriginal business
- the Request for Tender (RFT) or Request for Quotation (RFQ) form included consideration of Aboriginal business
- the proposal or response to RFT/RFQ identified the respondent as an Aboriginal business
- procurement included a value for money assessment
- the evaluation considered Aboriginal participation
- delivery of the contracted supply of goods or services.

Only 18 of the 39 contracts (46%) documented all these elements while 21 (only 54%) documented considering Aboriginal businesses at the start of procurement and 20 (51%) included it in the request for tender. Consideration of Aboriginal employment was documented in 11 contract evaluations (28%).

While all four entities we audited have internal procedures that reference Aboriginal supply at some stage of the procurement process, documentation was often incomplete. This was despite large numbers of documents associated with individual procurements.

The APP supports Aboriginal employment but the extent is unclear and wider social impacts are not measured

Contracting Aboriginal businesses has increased Aboriginal employment on government contracts but the overall impact on Aboriginal employment is unclear

Finance is not tracking the levels of aboriginal employment under the APP. However, data provided by ABDWA shows that Aboriginal businesses employed more Aboriginal staff in 2023 (27.1% vs 0.3% for non-Aboriginal businesses). Contracting more Aboriginal businesses therefore entails more Aboriginal employment in government contracts. What is not clear is the extent to which this contributes to overall employment outcomes for Aboriginal people, in part because Finance is not measuring this under the APP.

A revision of the APP from 2022 included Aboriginal participation requirements (APRs) that include subcontracting and participation targets for Aboriginal employment. The APRs apply to all contracts with an estimated contract value of \$5 million and above that are delivered in the following industries:

- construction and maintenance
- community and social services
- education and training
- public administration and finance, or
- where a contract will be delivered predominantly to Aboriginal people or target the specific needs of Aboriginal people.

APRs impose obligations on suppliers to subcontract a certain percentage of the total contract value to registered Aboriginal business(es) and set targets for employment of Aboriginal people. The employment targets specify percentages of the contract labour force to be Aboriginal that vary by region:

- 2% of the contract labour force in the Perth metropolitan area, South West, Great Southern, Peel, Wheatbelt and all state-wide contracts
- 5% in Gascoyne, Mid West and Goldfields-Esperance
- 10% in Pilbara and Kimberley.

These targets aim to extend benefits of the APP to more potential employees with the aim also of spreading benefits more widely in Aboriginal communities but State entities have either not complied with these requirements or have not been reporting on them. As a result, data provided in a dashboard designed to track APRs is not reliable.

Finance told us that its investigations so far suggest entities have not been implementing APRs in cases where they should have been applied. This suggests State entities might not be clear about what is required of them. Given this uncertainty, Finance has decided not to report on performance against APR targets until it has a better understanding of the issue.

The APP has likely benefited Aboriginal employment in the regions but neither Finance nor contracting entities are measuring the extent of it

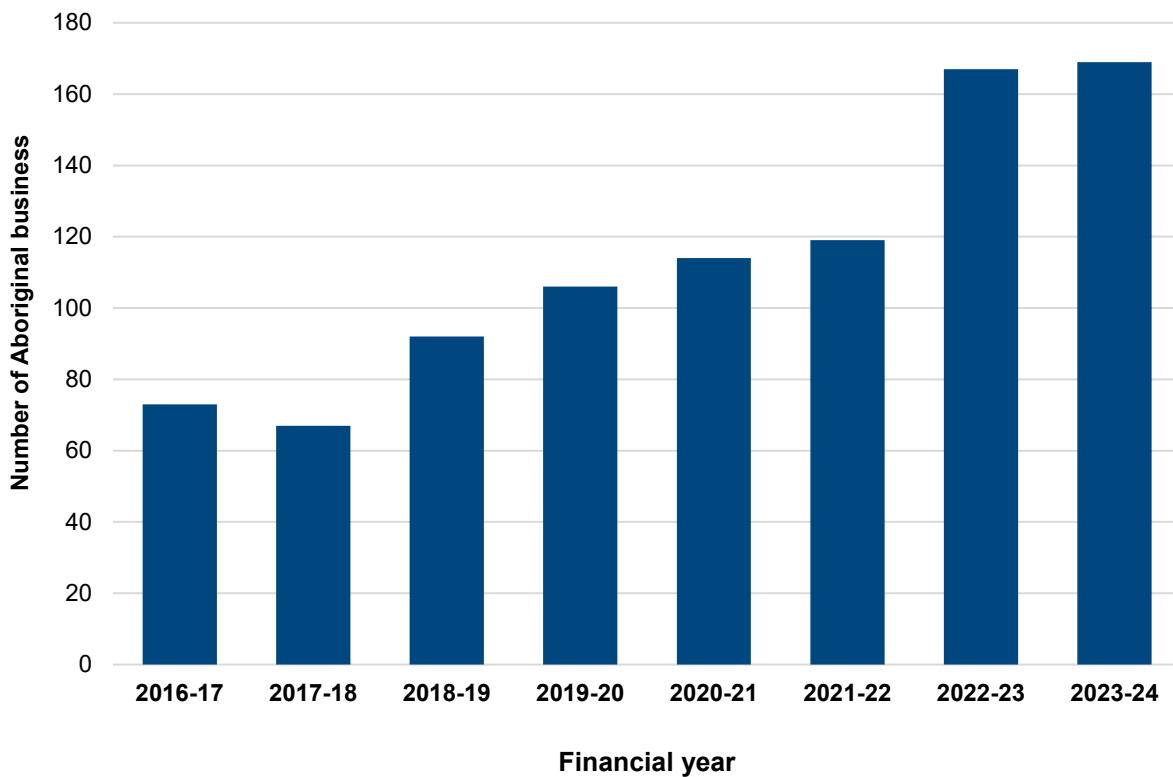
The location of some Aboriginal businesses in the regions means that employment by them creates benefits for regional Aboriginal communities. In 2023-24, 148 (41%) of the total 357 contracts were in the regions. The extent to which economic benefits have flowed to the regions has not been measured but evidence of benefit is provided by examples. In one case, a local Aboriginal workforce was used to rebuild the Fitzroy Bridge after it was destroyed by flooding

(see case study). This provided employment opportunities in an area where unemployment rates have historically been high.

However, the episodic nature of project work means that the employment it generates is not ongoing for many employees, especially in remote locations. Entities we spoke to acknowledge this issue and have supported businesses with additional contracts but a broader collaborative approach from State entities that takes advantage of Aboriginal business networks and entity-supported liaison has not been implemented. For example, entities such as Main Roads that employ staff in regional areas could share their networks with other entities active in their area.

The APP appears to be supporting new Aboriginal businesses but the full potential of the Aboriginal business sector has not been assessed

The number of Aboriginal businesses contracting with State entities for the first time has ranged between 47 and 63 each year since 2018, with 61 first-time businesses contracting in 2022-23. The addition of these businesses has increased the total year on year rather than just replaced businesses that have no contracts with state entities that year (Figure 5).



Source: OAG using Finance data

Figure 5: Number of Aboriginal businesses contracting with State entities each year. The policy applied from 2018-19

However, Finance has not assessed how much of this increase is made up of new businesses and the lack of data means we do not know whether or how much of the increase is due to new businesses starting up, existing business contracting with government for the first time, or changes in names and structures of businesses already under contract. This suggests that while the APP may have encouraged and supported increased capability in Aboriginal businesses, Finance has not assessed the potential capacity of the sector and so cannot gauge the impact of the policy or what it might expect the policy to achieve.

Case study 1: Repairing the Fitzroy River Bridge

In January 2023, flooding caused by ex-Tropical Cyclone Ellie destroyed the Fitzroy River bridge, breaking the Kimberley's main road link between Broome in the west and Kununurra in the east. Eleven months later, a new, longer bridge opened following a building project in which Aboriginal-owned businesses participated.



Source: Main Roads WA

According to Main Roads WA, the benefits to Kimberley communities were substantial. It advised that up to 28 February 2024:

- more than 260 local Aboriginal workers were engaged on the project
- they contributed 111,818 hours (23% of total working hours) to the project
- \$36.35 million (22% of the total spend) went to Aboriginal-owned businesses
- expenditure was spread across 25 businesses, 21 in the Kimberley Region.

The Fitzroy Bridge Alliance (FBA) between Main Roads WA, Georgiou Group Pty Ltd, BMD Constructions Pty Ltd, and BG&E Pty Ltd invested in a training and development program to upskill the local workforce and prepare workers for ongoing opportunities in the civil and mining sectors. This resulted in:

- more than 40 workers receiving national plant training certificates
- over 100 completions of General Construction Induction training
- 27 traffic control tickets being issued.

FBA also helped people to start or develop their own businesses by providing free business development support, guidance when purchasing machinery and opportunities to demonstrate capability. An example of this is a Nyikina and Walmajarri traditional owner from Noonkanbah who was one of the first workers on the New Fitzroy River Bridge project in May 2023 as a machine operator. During his time on the project, he saw an opportunity to start his own earthworks contracting company. With the support of a consultant, Main Roads and the project team, he started a company which began work on its first contract with the Shire of Derby, West Kimberley carrying out maintenance grading on roads between Koorbye, Bidijul, Yakanarra and Djugerari. The company now employs two local workers.

Source: Main Roads WA

Feedback from Aboriginal businesses suggests that entities could do more to engage Aboriginal business

A 2023 survey of Aboriginal business by Finance received 93 responses contained a variety of views. These included positive responses from businesses who had secured contracts and attributed this to the APP but also responses from businesses that saw no benefit from the APP. Others felt contracting entities were 'box ticking' rather than recognising merit.

Waalitj Hub, a business support group within the Waalitj Foundation, says it has observed State entities taking less interest in Aboriginal business once their target has been reached and preferring to re-contract with businesses they know rather than contracting new ones. Waalitj also highlighted the time between tendering and being awarded a contract can be up to nine months, which can be too long for some businesses to manage, given the often substantial out-of-pocket costs of the tendering process.

Survey responses and feedback from Morrgul indicate that some Aboriginal businesses decline to tender because the process is complex and onerous or they are unsure of their capacity to deliver. However, we heard no evidence that criteria embedded in the APP settings act as a deterrent.

We also heard that State entities can find themselves competing with large corporates such as mining companies and unable to offer competitive terms. Such commercial companies can also offer higher wages to employees, including for such ancillary services as nurses at mine sites. This means that Aboriginal businesses may have difficulty finding and retaining the staff needed to deliver a government contract that the business itself is willing and able to manage.

While this evidence is anecdotal, taken altogether it suggests there is scope for State entities to increase their engagement with Aboriginal business.

The APP focuses on contracting opportunities so Finance has not assessed the broader outcomes of the APP and has not developed a framework for doing so

The contribution of the APP to social and economic outcomes for Aboriginal businesses and communities has not been quantified. Research conducted at the Australian National University in 2014 concluded that 'increasing Indigenous employment rates to the level of the non-Indigenous population would result in extensive economic, health and social gains to Indigenous people, communities and the government.'⁹ This suggests that increasing levels of Aboriginal business activity would, by increasing Aboriginal employment, produce benefits for Aboriginal businesses and communities generally.

However, whether and how much such benefits could be attributed to the APP has not been measured by Finance or contracting entities. Finance's implementation of the APP has not produced a rich enough data set to enable a more comprehensive assessment of its impacts because it prioritised simplicity and robustness over range of data collection. This has limited Finance's ability to assess the APP's impacts beyond high level, sector-wide measures of contract numbers and value.

The Aboriginal business sector in WA had been growing before the APP. Supply Nation has reported census data showing the number of Aboriginal owner-managers in WA increasing before the APP was introduced from 658 in 2006 to 825 in 2011 and 935 in 2016.¹⁰ More recently, the number of Aboriginal businesses registered with ABDWA increased from 743 in

⁹ M. Gray, B. Hunter and N. Biddle, *The Economic and Social Benefits of Increasing Indigenous Employment*, Centre for Aboriginal Economic Policy Research Topical Issue, ANU College of Arts & Social Sciences, 2014, issue 1.

¹⁰ Langford, Z. 'The geographies of Indigenous business in Australia: An analysis of scale, industry and remoteness', *Supply Nation Research Report*, 2023, no.8.

January 2022 to 927 in December 2023. This is broadly consistent with Supply Nation's current tally of 1,064 businesses in WA.

At the same time, contracting with State entities has been growing. The number of Aboriginal businesses contracting with entities increased from 67 in 2017-18 before the APP commenced in July 2018 to 167 in 2022-23 while the value of those contracts went from around one per cent of total value of State Government contracts prior to 1 July 2018 to 13.5% in 2022-23. The number of Aboriginal suppliers reached 169 in 2023-24.

However, the data does not distinguish between businesses that existed prior to the APP or prior to contracting with State entities and those that might have been formed as a result of the APP. Similarly, the data cannot identify those Aboriginal businesses that would have succeeded in a competitive marketplace without the APP. For these reasons, it is currently not possible to accurately quantify the APP's benefits.

WA is not alone. No Australian jurisdiction has yet developed a publicly available framework for assessing the broader social and economic impacts of procurement policies on Aboriginal communities. Overseas, reporting on the Progressive Procurement Policy in New Zealand and the Yukon First Nations Procurement Policy (YFNPP) in Canada are limited to business activity data. A 'Monitor and Review Committee' has been established for the YFNPP but it is yet to deliver impact assessments beyond business activity data.

Research currently underway at the University of Melbourne aims to assess the impact of procurement policies on Aboriginal communities and the Closing the Gap targets but results are not yet available. Finance is contributing to this research.

Appendix 1: State entity performance against targets 2023-24

The information in this table was taken from the APP Performance Report 2023-24 by Finance and was correct at September 2024. It is based on data from Tenders WA which is a 'live' source that is updated and corrected over time. While there may be adjustments in the future, the report provides a useful indication of the level of entity compliance with the policy.

The table does not list entities to which the policy applies but for which compliance is not practical or relevant to their operations. Entities in this category include:

- entities for whom the total number of contracts or their size make expectations of compliance unrealistic
- entities that procure goods and services under their own legislation and do not use Tenders WA
- committees whose administrative support is provided by other entities which procure on their behalf and record the procurement against their own targets
- wholly owned commercial businesses
- charitable foundations.

This leaves the 49 entities listed below for the 2023-24 financial year.

State entity	Met target
Art Gallery of Western Australia	Yes
Central Regional TAFE	Yes
Child and Adolescent Health Service	Yes
Department of Biodiversity, Conservation and Attractions	Yes
Department of Communities	Yes
Department of Education	Yes
Department of Energy, Mines, Industry Regulation and Safety	Yes
Department of Finance	Yes
Department of Jobs, Tourism, Science and Innovation	Yes
Department of Justice	Yes
Department of Local Government, Sport and Cultural Industries	Yes
Department of Planning, Lands and Heritage	Yes
Department of the Premier and Cabinet	Yes
Department of the Registrar, WA Industrial Relations Commission	Yes
Forest Products Commission	Yes
Landgate	Yes
Legal Aid Commission of WA	Yes
Main Roads Western Australia	Yes
Mental Health Commission	Yes
Metropolitan Cemeteries Board	Yes
North Metropolitan TAFE	Yes
Office of the Auditor General for Western Australia	Yes

State entity	Met target
Public Sector Commission	Yes
Small Business Development Corporation	Yes
South Regional TAFE	Yes
State Library of Western Australia	Yes
WA Country Health Service	Yes
Western Australia Police Force	Yes
Western Australian Museum	Yes
Western Australian Planning Commission	Yes
Chem Centre*	No
Corruption and Crime Commission	No
Department of Fire and Emergency Services*	No
Department of Health*	No
Department of Primary Industries and Regional Development*	No
Department of Training and Workforce Development*	No
Department of Transport*	No
Department of Water and Environmental Regulation*	No
East Metropolitan Health Service	No
Economic Regulation Authority*	No
Health Support Services*	No
Insurance Commission of Western Australia	No
Lotterywest*	No
North Metropolitan Health Service	No
PathWest Laboratory Medicine WA	No
Public Transport Authority	No
South Metropolitan Health Service	No
South Metropolitan TAFE	No
VenuesWest	No

Source: Finance

** These agencies provided supplementary reporting that indicated additional purchases from Aboriginal businesses that did not count toward the targets.*

Data disclaimer

- Contract values are GST inclusive.
- Data represents contracts with an award value at and above \$50,000 only.
- Contract award values do not include:
 - any contract variations
 - the contract value for individual contractors awarded to a panel arrangement when the panel has been awarded as a standing offer. The true value of contracts awarded to Aboriginal businesses may therefore be more than reported
 - data is reliant on the accuracy and availability of information uploaded to Tenders WA.

Data exclusions

- Any contracts awarded during 1 July 2023 to 30 June 2024 but loaded on Tenders WA after the date of the data extraction (9 September 2024).
- Any contracts that do not contribute to the achievement of APP targets including:
 - contracts valued below \$50,000
 - subcontracting arrangements
 - common use or group buy arrangement contract award information. (Note: contract purchasing information is included where the buying rules stipulate the need to publish the contract award on Tenders WA)
 - contracts awarded by a third party such as a facilities manager
 - grant agreements
 - joint venture arrangements where the entity is not a registered Aboriginal business.

Auditor General's 2024-25 reports

Number	Title	Date tabled
5	Implementation of the Aboriginal Procurement Policy	21 November 2024
4	Quality and Utilisation of Emergency Department Data	20 November 2024
3	Management of State Agreements	30 October 2024
2	Legislative Reform Priorities and Timeframes – Opinion on Ministerial Notification	19 August 2024
1	Supplier Master Files – Better Practice Guide	1 August 2024

**Office of the Auditor General
for Western Australia**

7th Floor Albert Facey House
469 Wellington Street, Perth

T: 08 6557 7500

E: info@audit.wa.gov.au

www.audit.wa.gov.au



@OAG_WA



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