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Date: 30 August 2019

Our Ref: City of Ballarat submission 2019

Your Ref:

Australian Government  
Productivity Commission  
Indigenous Evaluation Strategy

Dear Commissioner,

**RE: INDIGENOUS EVALUATION STRATEGY SUBMISSION FROM THE CITY OF  
BALLARAT**

On behalf of the City of Ballarat, this letter outlines our submission to the Issues Paper dated June 2019.

Our submission aims to address the many questions outlined in the paper, the comments below come from both Council Officers and members of KEAG – The City of Ballarat's Koorie Engagement Action Group.

**1. COMPONENTS OF THE INDIGENOUS EVALUATION STRATEGY**

We agree with the main components of the Indigenous evaluation strategy as long as they are developed in conjunction with People from an Aboriginal and Torres Strait Islander background

**2. APPLYING THE STRATEGY TO MAINSTREAM PROGRAMS**

The best way to address mainstream programs is by using an Indigenous methodology. Aboriginal and Torres Strait Islander people have been over researched and need to contribute to the body of knowledge gathering so that is accurately about them, for them and by them, rather for just evaluations sake.

**3. GOVERNMENT PROGRAMS**

The key message should be that there is no one size that fits all and that People from the Aboriginal and Torres Strait Islander community are best placed to develop and implement policy. Also, there needs to be alternatives to what is offered and much more work put into

delving the “why” something doesn’t work or what extra help is required. For instance, measuring school attendance rates is meaningless unless you understand the complexity surrounding why a child can’t attend.

Self-determination principles need to be applied.

#### 4. EVALUATION APPROACHES AND METHODS

Some co design of evaluation methods when developing and testing policy and programs would be useful, Aboriginal and Torres Strait Islander evaluation methods as stated such as knowledge sharing, yarning etc. should be respected and form a part of most evaluation.

#### 5. CHALLENGES OF EVALUATION

Evaluation should always be planned for with a clear reason for the evaluation that is suggested. However, care needs to be taken on how the evaluation is written, who carries it out and how connected the evaluator/s are to the policy and program. In many instances an Aboriginal and Torres Strait Islander Person/s are best placed to evaluate success or failure.

#### 6. EVALUATION PRACTICE IN AUSTRALIA

There seem to be many practices across Government and little access to the data collected from these practices. It is unlikely that Aboriginal and Torres Strait Islander People and organisations have been involved in the initial policy or program formation and this is a problem, because immediately you have a disconnect.

You can better enable Aboriginal and Torres Strait Islander Organisations to lead evaluation and strengthen their evaluation capability in the same way as you would do with “mainstream programs.”

Provide resources and training with every policy and program that is rolled out by Government.

Good practice

- Aboriginal and Torres Strait Islander lead evaluation

Bad practice

- Not providing appropriate time to provide feedback

## **7. EVALUATION OVERSEAS**

Look to Canada and New Zealand for respectful, inclusive and best practice models.

## **8. RELEVANT PRINCIPLES FOR AN EVALUATION FRAMEWORK**

The principles stated in the document should be included, the other stakeholders should include Traditional Elders in the community.

## **9. PLANNING FOR EVALUATION EARLY IN THE POLICY CYCLE**

In most cases evaluation should be planned for as learnings will allow for changes and improvements to future policy and program.

Evaluation should be integrated into the program budget.

Key actions when in early stages of planning should identify who carries out the evaluation

## **10. INCORPORATING INDIGENOUS PERSPECTIVES INTO EVALUATION**

This is an area that can be improved, it is crucial for the knowledge and the insight of the Aboriginal and Torres Strait Islander community to be included into evaluation of all policies and programs. This could be improved by changing policy in the first place to ensure that Aboriginal and Torres Strait Islander Peoples have a voice.

The costs can be better integrated by allowing for them in the first place.

## **11. QUESTIONS ON THE INDEPENDENCE OF EVALUATIONS AND EVALUATORS**

A high level of independence is needed between evaluators and policy makers to ensure that policy and program is looked at critically and without bias.

## **12. ETHICAL EVALUATION**

Any evaluative research should be tested through an ethics committee even more so for a smaller community. Time and cost implications of ethical evaluation should be integrated into the structure of the program to ensure that it is carried out.

Ethical evaluation is only "ethical" when a true, open and honest conversation happens. The meaning of ethical evaluation could mean something different from what Aboriginal & Torres Strait Islander people find "ethical" to what Non-Aboriginal people find "ethical". The grounds for beginning ethical conversations/evaluation needs to be sorted prior to the evaluation as part of setting the scene



### *13. CULTURAL CAPABILITY*

The guidelines for Maori research ethics are excellent and should be considered. Also, any person or organisation that deals with the Aboriginal and Torres Strait Islander community should be required to undertake Cultural Capability training. This training should be facilitated by an Aboriginal or Torres Strait Islander Person/s

**Unconscious Bias** – Everyone holds unconscious beliefs about various social and identity groups – non-Aboriginal people/consultants need to participate in unconscious bias training to be better informed and build their cultural understanding, knowledge, history, values and past and current trauma faced by Aboriginal & Torres Strait Islander Peoples before proceeding with evaluation.

### *14. EVALUATION METHODS AND DATA*

Where possible data obtained from a policy change or program should be of high quality, if this level of data cannot be obtained then the actual relevance of the program should be considered in the light of the data that is likely to be available. All programs should clearly define the governance around the collection, use, managing, linking and sharing of data obtained.

### *15. EVALUATION TRANSPARENCY*

If an Aboriginal and Torres Strait Islander community or Person/s participate in a program that collects data about them they have a right to be shown the final evaluation.

The evaluation as with any other data collection method should ensure that privacy is always respected.

### *16. IMPROVING EVALUATIVE CULTURE, CAPABILITY AND CAPACITY*

There is always scope to strengthen how we improve the evaluation of policy and programs. Evaluation methods can be made clearer if the evaluation is considered in the very early stages of the design of the policy or program. The input of a number of Aboriginal and Torres Strait Islander People at this stage using a co design process would be very effective. Evaluators ideally should have had unconscious bias and cultural safety & awareness training.

### *17. DETERMINING EVALUATION PRIORITIES*

The process for review of evaluation priorities should be carried out as with any other Government policy or program

All policies and program's affecting Aboriginal and Torres strait Islander People should be the highest priority for evaluation. If policies & programs evaluation priorities are not being reviewed the evaluation itself become a shelved document and loses memento and enthusiasm for change.

#### *18. REVISING THE INDIGENOUS EVALUATION STRATEGY OVER TIME*

As with any other Government Strategy involve Aboriginal consultants

#### *19. ENGAGEMENT SUGGESTIONS*

Aboriginal health and service provision organisations

Aboriginal service specific areas of education

Aboriginal committees and community groups

Registered Aboriginal Parties

Thank you for the opportunity to comment on the issues paper.

Yours sincerely

Neville Ivey  
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City of Ballarat