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Indigenous Evaluation Strategy
Productivity Commission
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Dear Chair

On behalf of the Tasmanian Government, I congratulate the Productivity Commission on its release of the Draft Indigenous Evaluation Strategy. I also thank you for the opportunity to provide feedback on the Draft Strategy.

I note that the Draft Strategy addresses and incorporates many of the points made in the Tasmanian Government's response to the Productivity Commission's Indigenous Evaluation Strategy Issues Paper submitted in September 2019. I therefore hope that the following brief comments from a Tasmanian Government perspective will help the Productivity Commission to further refine the Strategy for delivery in October 2020.

Overarching principle: Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges (pp. 10-11)

In Table 1, the third point under the heading '*Reporting evaluation findings*' states that evaluators and commissioners will

'...ensure that evaluation findings are communicated back to the Aboriginal and Torres Strait Islander people, communities and organisations that participated.'

The Tasmanian Government suggests that this point could be strengthened by specifying that the outcomes of evaluations will also be monitored and communicated back to participants. This will help demonstrate to Aboriginal and Torres Strait Islander people that participating in evaluations is a worthwhile exercise because their feedback will be listened to and acted on. It will also work to strengthen trust relationships between government agencies and Aboriginal and Torres Strait Islander people.

The second point under the heading '*Building capability and a culture of evaluation*' states that evaluation processes will:

'...seek to build capability among Aboriginal and Torres Strait Islander evaluators, organisations and communities.'

The Productivity Commission may wish to consider that a long-term goal of the Strategy could be to equip, encourage and empower Aboriginal and Torres Strait Islander communities and organisations to commission and conduct their own evaluations of relevant policies and programs, independent of government agencies. The Tasmanian Government suggests that this would be a logical next step in the process of building capability and a culture of evaluation, not just within governments but in the community in general, and that by showing a willingness to consider the results of independent evaluations by Aboriginal and Torres Strait Islander people government agencies could demonstrate the respect and openness that contributes towards the broader goals of reconciliation.

Principle: Credible (pp. 12-13)

While the Strategy acknowledges the benefits of mixed methods, the Tasmanian Government believes it would be useful to more explicitly acknowledge the challenges faced in jurisdictions with small Aboriginal populations, such as Tasmania. Statistical analyses of data-sets specific to the Aboriginal and Torres Strait Islander population in Tasmania have limited power and reliability, and are often not useful representations of progress and outcomes. A direct reference to this challenge, and the limitations of quantitative data alone, could be incorporated at page 12 of the Strategy where it states that 'Mixed methods (combining qualitative and quantitative methods) can maximise the strengths and compensate for limitations of any single method or approach' and further states 'Agencies and evaluators should adopt methods that...suit the context in which the policy or program is operating..'

In Table 2, the first point under the heading 'Building capability and a culture of evaluation' states that government agencies will:

'...provide opportunities for staff to improve their capability in planning, commissioning, conducting and using evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people.'

Consistent with the third point under the heading 'Reporting evaluation findings' in Table 1, the Tasmanian Government suggests expanding this point to include opportunities for staff to improve their 'communication of evaluation findings' to Aboriginal and Torres Strait Islander people.

As per comments made in response to the overarching principle, the Tasmanian Government also suggests the addition of a further point under this heading that agencies 'equip, encourage and empower Aboriginal and Torres Strait Islander people to plan, commission, conduct and communicate the findings of evaluations of policies and programs affecting them.'

Principle: Useful (pp. 14-15)

In Table 3, the third point under the heading 'Building capability and a culture of evaluation' states that government agencies:

'...are open to receiving negative or unexpected evaluation findings and recognise that they are an opportunity to learn and improve policies or programs.'

In keeping with the suggestion that Aboriginal and Torres Strait Islander people be equipped, encouraged and empowered to commission and conduct evaluations of the policies and programs that affect them, the Tasmanian Government suggests expanding this point slightly to specify that government agencies are open to receiving the findings 'of both government and non-government evaluations.'

Principle: Ethical (pp. 16-17)

In Table 4, the fourth point under the heading 'Evaluation planning, design and conduct' states that:

'When evaluations are subject to formal ethical review, this should be done by an ethics committee with expertise in research with Aboriginal and Torres Strait Islander people.'

The Tasmanian Government suggests amending this point to ensure an Aboriginal and Torres Strait Islander perspective on the question of ethical evaluations:

'When evaluations are subject to formal ethical review, this should be done by an ethics committee including members with expertise in research with Aboriginal and Torres Strait Islander people and members of the Aboriginal and Torres Strait Islander community.'

This statement would show commitment to the overarching principle of the Strategy.

Principle: Transparent (pp. 18-19)

In Table 5, the point under the heading 'What to evaluate' states that agencies will:

'...publish evaluation forward work plans that detail the process and criteria for deciding what policies and programs are high priority for evaluation.'

To demonstrate the value of transparency and show that it is not simply a symbolic exercise, the Tasmanian Government suggests making these forward work plans open to comment and feedback, particularly from Aboriginal and Torres Strait Islander people. As with the previous suggestion, this would also show commitment to the overarching principle of the Strategy.

The fourth point under the heading 'Reporting evaluation findings' states that:

'The basis for evaluation findings are transparent.'

The Tasmanian Government believes that this point could be made stronger if it further specified that evaluation findings should be clearly argued and articulated. It may not be enough for agencies to simply report the 'what?' of evaluation findings without adequately explaining the 'how?' and the 'why?'.

The sixth point under the heading 'Reporting evaluation findings' states that:

'Agencies publish a response to evaluation findings.'

The Tasmanian Government suggests the addition of a further point to the effect that 'agencies report on the implementation and outcomes of evaluation findings.' As mentioned in a previous comment, the Strategy should aim to demonstrate to Aboriginal and Torres Strait Islander people that participating in evaluations is a worthwhile exercise because their feedback will be listened to and acted on.

A maturity approach to evaluation (p. 20)

Following comments made in response to the guiding principles of the Strategy and noting that the maturity model illustrated in Figure 3 will be developed in more detail prior to the release of the final Strategy, the Tasmanian Government suggests that a mature approach to evaluation by government agencies should be supportive and encouraging of, and open and responsive to, feedback and evaluation findings from Aboriginal and Torres Strait Islander people independent of government.

Action 1: Agencies should systematically identify evaluation priorities and publish evaluation forward work plans (p. 24)

In relation to Action 1 of the Strategy, and as per comments made in response to the transparency principle, the Tasmanian Government suggests that the evaluation forward work plans of government agencies should not only be made publicly available but should also be open to comments and feedback from stakeholders, and Aboriginal and Torres Strait Islander people in particular.

Action 5: Agencies should ensure that they have access to, or are able to collect, the data they need to effectively undertake evaluations under the Strategy (p.27)

In relation to Action 5 of the Strategy, the Tasmanian Government agrees with the observation that good data is essential to high-quality evaluation. However, the Tasmanian Government notes that due to time and other resourcing constraints there is often a temptation when conducting evaluations to construct the evaluation questions around what data is already available, rather than considering what questions and data might provide the most useful findings.

The Tasmanian Government therefore suggests that this Action include points encouraging agencies to focus primarily on the evaluation questions they want to answer and then consider the data required to answer those questions, rather than trying to fit evaluations to existing datasets. This will ultimately lead to the collection of valuable new data assets and evaluation findings that are more useful to both governments and Aboriginal and Torres Strait Islander people.

Action 8: Agencies should publish an accessible evaluation report summary (p. 28)

In relation to Action 8 of the Strategy, the Tasmanian Government understands and appreciates the spirit of this Action. Ideally, though, the Tasmanian Government believes that in keeping with the guiding principles of the Strategy all evaluation reports should be accessible to Aboriginal and Torres Strait Islander people as a matter of course. The Tasmanian Government suggests that this Action be reframed as encouraging agencies to produce clear and easily understandable evaluation reports as a default, rather than the current wording which implies that this would entail an additional administrative burden. This will help to keep the Strategy's guiding principles at front-of-mind for agencies conducting evaluations, and hopefully promote further consideration by agencies of how they can embed the Strategy's guiding principles in their work with Aboriginal and Torres Strait Islander people.

Action 9: A central evaluation clearinghouse should be established (p.28)

In relation to Action 9 of the Strategy, the Tasmanian Government notes that the outcomes of evaluations are not always transferrable across different circumstances (for example from a national level to local/state level, or from remote to urban areas). The Tasmanian Government suggests this Action could clarify that part of the role of the proposed central evaluation clearinghouse will be to categorise each evaluation as relevant to certain pre-defined contexts, to help policy managers readily identify evaluations with findings transferrable to their situation. This would reduce the likelihood of evaluation findings being applied inappropriately and save policy managers the administrative burden of reading through large numbers of reports to identify relevant findings.

Action 10: Agencies should publish a response to evaluation findings (p.28)

In relation to Action 10 of the Strategy and as per earlier comments, the Tasmanian Government suggests that agencies should also report on the implementation and outcomes of evaluation findings.

Action 12: The Strategy should be subject to independent review after five years (p.29)

In relation to Action 12 of the Strategy, the Tasmanian Government suggests that this Action note the possibility that the proposed independent review of the Strategy could be conducted by Aboriginal and Torres Strait Islander people. This would provide another opportunity to demonstrate commitment to the overarching principle of the Strategy.

A Guide to Evaluation under the Indigenous Evaluation Strategy

The above comments regarding the Strategy are also applicable to the accompanying Guide to Evaluation under the Indigenous Evaluation Strategy. The Tasmanian Government also wishes to raise an additional point applicable to the matters covered by the Guide.

The Tasmanian Government notes that many government policies and programs will likely not have the funding available to make large-scale, comprehensive evaluations commonplace. The Strategy and/or the Guide could therefore make provision for 'mini-evaluations' of all programs, to enable more programs

and agencies to take the first steps in building a culture of evaluation. This approach could be as simple as documenting the relevant policy rationale for a program, its scope, and how it is monitored to assess its effectiveness. A collection of properly targeted mini-evaluation data could potentially be as useful as a comprehensive evaluation report in identifying problems and suggesting improvements to policies and programs affecting Aboriginal and Torres Strait Islander people. Being less complex and resource intensive, mini-evaluations could also provide more opportunities to involve Aboriginal and Torres Strait Islander people, communities and organisations in the evaluation process.

Indigenous Evaluation Strategy Draft Background Paper

The Tasmanian Government notes the information requests included in the Productivity Commission's Draft Background Paper and offers the following responses relevant to Tasmania, and where the Tasmanian Government's experiences may be helpful.

Information request 5.1

The Tasmanian Government's view is that engagement on the evaluation of Aboriginal and Torres Strait Islander specific programs and services is best led by Aboriginal and Torres Strait Islander people themselves, as this allows for the consideration of cultural knowledge and sensitivities that may only be known by them. The most effective engagement strategies will likely be those designed in collaboration with local Aboriginal and Torres Strait Islander people, communities and organisations, and the outcomes may differ significantly depending on participants. The Tasmanian Government would caution against applying a 'one-size-fits-all' approach to evaluation engagement models across Australia, given the diversity of conditions and interests relevant to the Aboriginal and Torres Strait Islander population.

As the Guide notes, evaluation strategies in a co-design model should be prepared to include both qualitative and quantitative methods to obtain the necessary range of information to answer the evaluation questions. However, particularly in small jurisdictions such as Tasmania, a lack of quantitative data can sometimes lead to an overreliance on qualitative data. The Tasmanian Government suggests that any evaluation engagement model should be explicit about the limitations or biases that the proposed evaluation methodology may result in so that these are fully understood by participants and can be detailed in final reporting.

Information request 6.1

The new National Agreement on Closing the Gap includes a provision that the Productivity Commission will undertake a comprehensive review of all parties' progress against the National Agreement every three years. In view of this, the Tasmanian Government agrees with the Productivity Commission's proposal that the interim evaluation priorities for the Strategy should be aligned with the priority areas of the new National Agreement.

While the Tasmanian Government does not believe that there are priority areas missing from the new National Agreement, it may be worthwhile evaluating whether the policy priority principles of the new National Agreement are realised in practice at the local and regional level. Specifically, in smaller jurisdictions such as Tasmania, an evaluation of the performance of mainstream service providers compared with services provided by Aboriginal community-controlled organisations would be beneficial to Aboriginal and Torres Strait Islander people, as well as to government. Such an evaluation could identify areas where Aboriginal community-controlled organisations need further support from government to build capacity, or where there are advantages to providing services to Aboriginal and Torres Strait Islander people by way of mainstream providers.

Information request 7.3

The Tasmanian Government agrees with the suggestion that members of the proposed Indigenous Evaluation Council should be appointed by the Aboriginal and Torres Strait Islander community-controlled sector. These members could provide insight into the needs of Aboriginal and Torres Strait Islander people, as well as insight into the service practices best able to meet these needs. Consideration should also be given to bringing in, as needed, members from relevant professional associations, such as the Australian Medical Association. Members of professional associations would be able to provide a broader account of service delivery practices currently considered exemplary.

The Tasmanian Government's view is that the host agency of the Indigenous Evaluation Council, wherever that may be, should also participate on the Council, as these members could provide insight into the history of previous evaluations, and what might be priorities for improvement in future evaluation work.

Information request 9.1

The Tasmanian Government suggests that the highest priority indicators for inclusion in a data dictionary should be drawn from the new National Agreement on Closing the Gap. These indicators have been developed in partnership between governments and the Coalition of Aboriginal and Torres Strait Islander Peak Organisations, and so are already partially representative of the views of Aboriginal and Torres Strait Islander people. The Australian Institute of Health and Welfare was also involved in the development of these indicators, ensuring that the indicators can be reliably measured across jurisdictions.

Information request 9.2

While data linkage can indeed be a 'powerful tool', the Tasmanian Government cautions that it must be considered on a case-by-case basis. Data linkages might be beneficial when datasets are live and allow public officials – such as Police – to ascertain the 'service contact' history of an individual. Other linkages might be less beneficial, or even detrimental to the development of good public policy, such as when data are linked as aggregates and a generic pattern sought. In these cases, the generic patterns are likely to divert attention from, or predetermine perceptions of, the local and specific issues which require attention. The Tasmanian Government suggests that prior to asking the question 'what data linkages are important to Aboriginal and Torres Strait Islander people?' the aims of data linkage be considered more fully, and the possible adverse consequences, along with the positives, be fully explored.

Once again, the Tasmanian Government appreciates the opportunity to comment on the Productivity Commission's draft Indigenous Evaluation Strategy. I look forward to the release of the final Strategy in October 2020, which I am sure will be a valuable tool for improving the effectiveness of Aboriginal and Torres Strait Islander-specific policies and programs across Australia.

Yours sincerely

Hon Roger Jaensch MP
Minister for Aboriginal Affairs