

Submission to the Productivity Commission

**Response to the Indigenous Evaluation Strategy Issues Paper**

**Reconciliation Australia**

**September 2019**



## Summary

Thank you for the opportunity to make a submission to the Productivity Commission's review into Indigenous Evaluation Strategies. Reconciliation Australia is making this submission in response to the Issues Paper released in June 2019 'Indigenous Evaluation Strategy'.

Reconciliation Australia supports in principal, the development of a whole of government framework for the evaluation of Indigenous policies and programs. However, the way in which policy and programs evaluation is developed and implemented is just as important in moving towards a more reconciled Australia.

This submission emphasises the importance of respectful and sustained engagement with Aboriginal and Torres Strait Islander peoples and the opportunity for a coordinated evaluation approach to encourage ethical practices and amplify the collective voice of Indigenous peoples.

It also suggests that a co-design process for the development of the Indigenous Evaluation Strategy should be employed to ensure regular and structured engagement with Aboriginal and Torres Strait Islander peoples and peak bodies. Finally the submission outlines the importance of a flexible approach to monitoring and evaluation activity, to allow methodologies to be tailored and streamlined based on local context.

## 1. Introduction

Reconciliation Australia is the national organisation building and promoting reconciliation between Aboriginal and Torres Strait Islander peoples and other Australians for the wellbeing of the nation. We believe that a reconciled Australia is one where:

- Positive two-way relationships built on trust and respect exist between Aboriginal and Torres Strait Islander and non-Indigenous Australians throughout society.
- Aboriginal and Torres Strait Islander Australians participate equally and equitably in all areas of life, and the distinctive individual and collective rights and cultures of Aboriginal and Torres Strait Islander peoples are universally recognised and respected. That is, we have closed the gaps in life outcomes, and Aboriginal and Torres Strait Islander peoples are self-determining.
- Our political, business and community institutions actively support all dimensions of reconciliation.
- Aboriginal and Torres Strait Islander histories, cultures and rights are valued and recognised as part of a shared national identity and, as a result, there is national unity.
- There is widespread acceptance of our nation's history, and agreement that the wrongs of the past will never be repeated.

We recognise that achieving this vision requires significant government investment to improve outcomes for Aboriginal and Torres Strait Islander peoples in education, health, housing and employment. On this basis, Reconciliation Australia supports the Productivity Commission's overarching intention to develop an evaluation strategy for policies and programs affecting

Indigenous Australians, with this framework to be used as a guide for evaluation efforts and to allow for the establishment of principals for continuous improvement activity.

However, we also believe that the way in which policies and programs evaluation is developed and implemented is just as important in moving towards a more reconciled Australia. The success, credibility and legitimacy of monitoring and evaluation activity is reliant on Aboriginal and Torres Strait Islander people's participation to ensure adequate local context being considered.

A key action identified by Reconciliation Australia in the 2016 State of Reconciliation report, is the need for improved governance across Government. It is our view that the Governments approach to policy and program development in Aboriginal and Torres Strait Islander affairs is based on the following principles:

- good governance within government;
- respectful and sustained engagement with Aboriginal and Torres Strait Islander peoples, their representative bodies and community organisations;
- local and holistic approaches;
- long-term approaches supported by sustained and adequate funding; and
- evidence-based policies.

Comments and recommendations included in this submission are in relation to the overall approach to the development of an Indigenous Evaluation Strategy.

We make this submission with particular regard to the following points of enquiry, detailed within the Issues Paper:

#### **Questions on evaluation approaches and methods**

- Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?
- What factors (for example, circumstances or program characteristics) should be considered when choosing the most appropriate evaluation approach or method, and why?
- Which evaluation approaches are best suited to encouraging self-determination and valuing Aboriginal and Torres Strait Islander knowledge's? Why are they suitable?

#### **Questions on the challenges of evaluation**

- How can the challenges and complexities associated with undertaking evaluation be overcome — both generally, and in Indigenous policy specifically?
- In what circumstances is evaluation of policies and programs unlikely to be feasible or cost-effective?

These particular points speak strongly to our belief that approaches in Aboriginal and Torres Strait Islander affairs:

- must follow clear and transparent processes;
- must empower Aboriginal and Torres Strait Islander people and organisations; and
- must culminate in decisions based on clear evidence.

## 2. Recommendations

In response to the *Indigenous Evaluation Strategy Issues Paper*, released in June 2019, Reconciliation Australia recommends to the Productivity Commission that:

**Recommendation 1:** the Indigenous Evaluation Strategy should allow for flexibility in its approach to monitoring and evaluation activity to allow methodologies to be tailored and streamlined to allow for the consideration of local context.

**Recommendation 2:** The Productivity Commission is to ensure that the Indigenous Evaluation Strategy is publically available and easily accessed to encourage transparency and ethical practices. Inputs into monitoring and evaluation activity should also be clearly articulated to service delivery organisations.

**Recommendation 3:** The Productivity Commission should conduct a co-design process in the development of an Indigenous Evaluation Strategy, to ensure regular and structured engagement with Aboriginal and Torres Strait Islander peak bodies.

**Recommendation 4:** Results of monitoring and evaluation activity should be communicated to communities and organisations delivering services in a timely manner. Evidence and data used during the evaluation process should also be provided back to allow for organisations to continue to build on their own internal evaluation processes and support a community driven approach to evaluation.

**Recommendation 5:** The Principles Based Framework of the Indigenous Evaluation Strategy should include guidance on the ethical use of data, including consideration of principles in relation to data sovereignty, potential community benefit from broader use of data beyond direct evaluation, and service delivery organisation capability building through ongoing access to data.

**Recommendation 6:** Adequate resources should be allocated to allow for rigorous evaluation and continuous quality improvement strategies for Aboriginal and Torres Strait Islander programs to be incorporated into program and policy planning and implementation, particularly at a service delivery level.

**Recommendation 7:** The Productivity Commissions considers the results of the review activity conducted over the Governments Indigenous Advancement Strategy when developing an Indigenous Evaluation Strategy.

### 3. Measuring outcomes vs measuring impact

#### Question on evaluation approaches and methods

- Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?
- How can the challenges and complexities associated with undertaking evaluation be overcome — both generally, and in Indigenous policy specifically?

#### Response

It is our experience that Aboriginal and Torres Strait Islander organisations and experts have the view that past policy and program evaluation and monitoring have resulted in limited evidence for the effectiveness and efficiency of most programs and policies impacting Aboriginal and Torres Strait Islander peoples<sup>1</sup>.

To improve on this evidence base and to better inform future policy and program design, best practice principals for robust evaluation practices should be embedded in the development of the Indigenous Evaluation Strategy. This includes the need for evaluations to be impact focused in an effort to better understand if objectives are being met and the impact activity is having on Aboriginal and Torres Strait Islander peoples<sup>2</sup>.

The measurement of outcomes and the measurement of impact is different. Outcomes are focused on what has been achieved and can produce clear metric or units of measurement which can be tracked over time. Measuring the impact of a policy or program allows for us to understand the difference being made to the lives of a community. This takes time and illustrating the impact a policy or program has in affecting positive change in the lives of Aboriginal and Torres Strait Islander people often does not align to policy and program reporting cycles.

It is the view of Reconciliation Australia that the Indigenous Evaluation Strategy should include a focus on measuring results around both outcomes and impact on Aboriginal and Torres Strait Islander peoples.

It is also our experience that community needs vary over time and are often dependent on the location and individual community circumstance. Recognising the unique context within which Aboriginal and Torres Strait Islander peoples live is essential in identifying the needs of these communities and in understanding how a policy or program may impact them.

In the development of an overarching Indigenous Evaluation Strategy, the criteria for measurement and assessment should be flexible and allow for tailored methodology, considerate of local context. This will include consideration of:

- Location;
- community details (such as demographics);
- program and policy type;
- program and policy objectives; and
- an understanding of community need.

The understanding of local context ensures that interdependent factors can be identified and a more strategic approach taken to positively impact Indigenous communities and to creating positive change.

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<sup>1</sup> Australian Institute of Family Studies (February 2017), *Evaluating the outcomes of programs for Indigenous families and communities*, <https://aifs.gov.au/cfca/publications/evaluating-outcomes-programs-indigenous-families-and-communities>

<sup>2</sup> Auditor-General Report No.47 (June 2019), *Evaluating Aboriginal and Torres Strait Islander Programs*, Available at: <https://www.anao.gov.au/work/performance-audit/evaluating-indigenous-programs#22-0-4applicationoftheframework>



## 4. Evaluation embedded in policy and program design

### Question on evaluation approaches and methods

- Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?
- What factors (for example, circumstances or program characteristics) should be considered when choosing the most appropriate evaluation approach or method, and why?
- In what circumstances is evaluation of policies and programs unlikely to be feasible or cost-effective?

### Response

Adequate planning and resource allocation for the evaluation of policies and programs is essential to ensure a robust, relevant and reliable approach is taken. This includes identifying any risks or barriers in the implementation of evaluation and monitoring activity, prior to commencing any work.

Effective planning for evaluation activity should be built into program design and carefully planned to ensure the criteria and methodology is culturally appropriate and provides an adequate evidence base for assessment<sup>3</sup>.

Embedding evaluation in policy and program design also encourages a culture of evaluation within an organisation. This means, developing a culture of accountability and continuous improvement, with decisions based on evidence. Organisations with a culture of evaluation and continuous improvement are likely to collect data and conduct regular analysis to understand how their work is impacting on their local community and Aboriginal and Torres Strait Islander peoples more broadly<sup>4</sup>.

It is the recommendation of Reconciliation Australia that the Productivity Commission considers the results of review activity conducted over the Governments Indigenous Advancement Strategy when developing an Indigenous Evaluation Strategy. A number of lessons can be learnt from the introduction of the Indigenous Advancement Strategy in 2014, which did not have a formal evaluation strategy or evaluation funding for its first two years of operation. One of the key learnings from the implementation of the Indigenous Advancement Strategy Evaluation Strategy was the need to formalise and prioritise evaluation activity<sup>5</sup>.

It is also important that the Indigenous Evaluation Strategy is publically available and easily accessed to encourage transparency and ethical practices. There are few examples of programs and policies with publically available evaluations strategies and frameworks<sup>6</sup>. This presents challenges for service delivery organisations who are often unaware of the inputs into monitoring and evaluation activity required of them. This has further impact on policy agencies and their ability to monitor and evaluate policies and program with inaccurate or incomplete evidence for assessment<sup>7</sup>. The clear articulation of requirements during the design and implementation phases of programs and policies will help to mitigate risk of having limited evidence for the effectiveness

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<sup>3</sup> Australian Institute of Family Studies (February 2017), *Evaluating the outcomes of programs for Indigenous families and communities*, <https://aifs.gov.au/cfca/publications/evaluating-outcomes-programs-indigenous-families-and-communities>

<sup>4</sup> Australian Institute of Family Studies (November 2014), *Developing a culture of evaluation and research*, <https://aifs.gov.au/cfca/publications/developing-culture-evaluation-and-research/introduction>

<sup>5</sup> Auditor-General Report No.47 (June 2019), *Evaluating Aboriginal and Torres Strait Islander Programs*, Available at: <https://www.anao.gov.au/work/performance-audit/evaluating-indigenous-programs#22-0-4applicationoftheframework>

<sup>6</sup> Australian Institute of Family Studies (February 2017), *Evaluating the outcomes of programs for Indigenous families and communities*, <https://aifs.gov.au/cfca/publications/evaluating-outcomes-programs-indigenous-families-and-communities>

<sup>7</sup> Australian Institute of Family Studies (February 2017), *Evaluating the outcomes of programs for Indigenous families and communities*, <https://aifs.gov.au/cfca/publications/evaluating-outcomes-programs-indigenous-families-and-communities>

and efficiency of most programs and policies impacting Aboriginal and Torres Strait Islander peoples.

This supports the view of Reconciliation Australia, that evaluation approaches and methods should be informed by program circumstances or program characteristics, and embedded in the design phase. This ensures that evaluation strategies align to all other relevant strategic frameworks and ethical guidelines for undertaking evaluation of Indigenous peoples, and that the process for establishing and implementing methods of measurement and assessment are an ongoing process, conducted over the life of a program or policy.

## 5. Respectful and sustained engagement with communities

### Question on evaluation approaches and methods

- *Which evaluation approaches are best suited to encouraging self-determination and valuing Aboriginal and Torres Strait Islander knowledge's? Why are they suitable?*

### Response

Good relationships, based on the universal elements of trust, understanding, communication and mutual respect, are at the heart of reconciliation. Good relationships are also required for the successful development and implementation of government policies and programs aimed at improving the circumstances of Aboriginal and Torres Strait Islander peoples.

The way in which governments at all levels engage with people during the policy and program development, implementation, monitoring and evaluation is an important part of this relationship. Respectful engagement demonstrates a commitment to building strong ongoing relationships and a will to work together to effectively address agreed issues.

Aboriginal and Torres Strait Islander organisations and experts are increasingly calling for a cultural determinant approach to improving socio-economic outcomes. Embedding culture in the approach to evaluation activity is essential in encouraging ethical and a culturally appropriate process and practices<sup>8</sup>.

A collaborative approach to the design of an evaluation strategy ensures that processes are robust and results are relevant and evidence based. This also ensures that the community values and cultural practices of Aboriginal and Torres Strait Islander peoples are respected and allow for cultural legitimacy in evaluation processes to be established.

This approach is in line with a participatory evaluation framework. This framework encourages respectful and sustained engagement with Aboriginal and Torres Strait Islander peoples throughout all stages of the program and policy lifecycle. In relation to evaluation, this approach encourages engagement at any stage of the process, including design, data collection, analysis, management and reporting. Participatory evaluation also encourages feedback on the results of the evaluation to be communicated back to the relevant community once completed. The requirement to provide feedback to the relevant community should be included as one of the key best practice principles within the Indigenous Evaluation Strategy, in an effort to form positive two-way relationships built on trust<sup>9</sup>. Consideration of ownership of data used for evaluations and ethics around the evaluation approach should be addressed as part of the Principles Based Framework of the Indigenous Evaluation Strategy. This should include consideration of data sovereignty, and how this can support better outcomes, impact, and empowerment of communities.

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<sup>8</sup> These calls can be found in the work of the Family Matters Campaign, the National Health Leadership Forum, the Lowitja Institute and the Close the Gap Campaign.

<sup>9</sup> Better Evaluation (cited 2 September 2019), *Participatory Evaluation*, available at: [https://www.betterevaluation.org/en/plan/approach/participatory\\_evaluation](https://www.betterevaluation.org/en/plan/approach/participatory_evaluation)

It is the recommendation of Reconciliation Australia, that a co-design process for the development of the Indigenous Evaluation Strategy is employed to ensure regular and structured engagement with Aboriginal and Torres Strait Islander peoples and peak bodies.