



**The Western Australian Government's
Submission to the
Productivity Commission's Issues Paper
for the Indigenous Evaluation Strategy**

What objectives should a strategy for evaluating policies and programs affecting Aboriginal and Torres Strait Islander people seek to achieve?

The Western Australian Government (WA) supports the broad objective of the Indigenous Evaluation Strategy (the Strategy) to deliver better outcomes for Aboriginal and Torres Strait Islander people. Within this objective, the strategy should aim to:

- achieve a standard of excellence across the Australian Public Service by providing guidance to agencies for achieving high quality, ethical and transparent evaluation practice, and by capturing evaluation practice data to inform continual learning and improvement;
- maximise Aboriginal engagement in evaluation design and implementation, by focusing on genuine partnerships and co-design;
- build on and promote Aboriginal capacity;
- emphasise cultural security and cultural competence;
- be flexible, adaptable, and responsive to local, place-based circumstances;
- be evidence-based;
- ensure that evaluation results and insights are able to influence decision-making, providing transparency and accountability; and
- provide value for money for both the Government and the Aboriginal community (noting that an undue emphasis on this objective may counteract some of the other objectives listed).

Several of these themes are expanded on later in this submission.

Do you agree with the main components of an Indigenous Evaluation Strategy suggested by the Commission? Should other components be included? If so, why?

The components provide a useful framework for further developing the Strategy, and ensure that Aboriginal and Torres Strait Islander people and other stakeholders have the opportunity to shape it.

WA notes the Strategy will apply directly to Australian Government agencies, however stakeholders including State and Territory governments and local service providers are also key partners in policy implementation and evaluation. Given Indigenous policy is an area of significant crossover between Commonwealth and State/Territory government responsibility, the extent to which the Strategy may have implications for other parties is not clear and requires further consideration.

For example it is not evident whether policies or programs affecting Indigenous Australians that are co-funded by the Commonwealth and States/Territories under the Strategy, fall within its scope.

Particular attention should be given to whether the Strategy is intended to apply to Intergovernmental Agreements, as this may affect State/Territory government agencies, and have important implications for intergovernmental funding arrangements.

WA also notes the Strategy may apply to both current and future programs affecting Aboriginal and Torres Strait Islander people. In many cases, current programs do not include evaluation requirements and no budget has been assigned for this process. Additional funding may be required to ensure evaluation activities occur for both current and future programs. Practical resources may also need to be made available to support Government agencies to translate the evaluation framework into practice.

What is the best way to address mainstream programs in the Indigenous Evaluation Strategy?

The Strategy should not be limited to Indigenous-specific Australian Government policies and programs. Too often, the impact of mainstream policies and programs on Aboriginal and Torres Strait Islander people is not adequately considered in evaluation. This is particularly of concern, as 'four in every five dollars spent by the Australian Government in providing services to Aboriginal and Torres Strait Islander people is spent through mainstream programs and services' (Issues Paper, p. 5).

Accordingly, the Strategy should require mainstream policies and programs to consider, and include, a comparison of achieved outcomes for Indigenous and non-Indigenous people in evaluating success. This will:

- capture essential information about changes in the social and economic wellbeing of Aboriginal and Torres Strait Islander people;
- highlight to mainstream providers the need, as part of their core business, for programs to consider the impact of program efficacy for Aboriginal and Torres Strait Islander people; and
- create an important evaluation in itself – to measure the changing appreciation by Australian Government agencies in considering the impact and success of their programs on Aboriginal and Torres Strait Islander people.

Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?

There is no single approach or methodology that can be applied in all circumstances, and the Strategy should accommodate a degree of flexibility in the choice of evaluation approach adopted by Australian Government agencies.

Approaches such as developmental evaluation, participatory evaluation and realist evaluation, can sit well in evaluating programs affecting Aboriginal and Torres Strait Islander people. Some approaches incorporate methods that are culturally sensitive, such as storytelling and spending time with Indigenous people to gain a deeper understanding of issues. The choice of evaluation approach should be made on a fit-for-purpose basis in each instance.

While randomised control trials (RCTs) are considered the 'gold standard' in evaluation methodology, there are practical considerations and sensitivities associated with creating 'treatment' and 'control' groups in the context of policies and programs impacting Aboriginal and Torres Strait Islander communities. RCTs also tend to be very expensive and resource intensive.

Nevertheless, they may be considered applicable in some instances, and can be used in concert with other approaches. A mixed evaluation approach including both quantitative and qualitative methods may provide the best insights.

Quasi-experimental methods, including the phased introduction of a particular program, or the selection of comparable control sites for a place-based trial, can deliver some of the benefits of RCTs while avoiding some of the difficulties.

What factors (for example, circumstances or program characteristics) should be considered when choosing the most appropriate evaluation approach or method, and why?

Broadly speaking, the factors to be taken into account include:

- consultation with, and input from, the local Aboriginal and Torres Strait Islander people in evaluation design;
- policy/program characteristics, including:
 - cost;
 - geographic or population reach;
 - policy/program stage and potential to be pilot;
 - priority;
 - whether the policy or program involves any form of involuntary engagement (e.g. cashless welfare card, banned drinkers register); and
 - key risks;
- existing policy controversies or specific hypotheses to be tested (e.g. whether explicit instruction improves literacy results, or whether elder-based sentencing reduces recidivism);
- evaluation purpose (including capturing information relevant to Aboriginal people and their needs);
- evaluation capacity and resource requirements;
- evaluation timeframes, including reporting requirements;
- evidence base and data availability;
- the existence of other relevant similar programs in the same geographical area, which are either under evaluation or in need of evaluation (including non-Commonwealth programs);
- previous evaluation findings; and
- evaluation audience/application.

Specific factors that should be considered in seeking Indigenous input into evaluation design include:

- determining which Aboriginal stakeholders should be consulted, how cultural or political dynamics might impact on consultation, and how that consultation will take place (e.g. through steering groups, advisory groups etc.);
- the nature of relationships between Indigenous and non-Indigenous stakeholders; and
- Indigenous stakeholders' capacity to participate in evaluation, which may relate to logistical constraints (e.g. remoteness), experience and knowledge of a program/policy, and degree of support from non-Indigenous stakeholders.

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

In what ways can Indigenous and Western evaluation approaches be successfully combined?

Critiques of approaches to evaluation typically emphasise the overt focus on accountability and a lack of involvement of Aboriginal people in determining what issues and outcomes are relevant to them. For this reason, evaluation approaches that allow Indigenous voices to be heard and actively participate in evaluation design are often the 'missing gap' in the review of policies and programs impacting their communities.

The critical factors that need to be considered are engaging and collaborating with Aboriginal and Torres Strait Islander people, and co-designing an appropriate evaluation framework. This will assist in building a long-term evaluation culture, and facilitate a sense of ownership by Aboriginal people in the process.

A promising approach is to support communities to design, own and administer baseline and follow-up studies. In these approaches (previously used in Broome and Wiluna), communities work with expert researchers to develop survey questions that are relevant to their own data needs, as well as those that are relevant to government and industry stakeholders. Local community members are trained to administer the survey, which provides valuable transferable skills as well as improving the quality of responses.

Most Significant Change (MSC) evaluations might also be applicable in some circumstances. Rather than focussing on quantitative outputs and activities, these evaluations collect stakeholders' stories about program and policies through consultation at the field level, with the 'most significant' stories being selected (both positive and negative).

This approach can assist in clarifying stakeholders' values and potential indicators of success, and improve stakeholder relationships. It is a flexible and accessible method of evaluation for some Indigenous communities, and is a good way of identifying unexpected outcomes of policy or program delivery. However, this method can often be time consuming and resource intensive, and may not be suitable for evaluations requiring greater quantitative analysis.

How can the challenges and complexities associated with undertaking evaluation be overcome — both generally, and in Indigenous policy specifically?

Strategies could include:

- Early planning of evaluation in the design of the program/policy, through a monitoring and evaluation framework. This ensures that any challenges and complexities are identified and mitigated as much as possible, meaningful questions are asked, the purpose of the evaluation is clarified, and data limitations are minimised. It will also help to build a culture of evaluation within the public service, encouraging it to be seen as an ongoing process throughout the life-cycle of the policy or program rather than just an end-of-program activity.
- Early identification of and engagement with Aboriginal and Torres Strait Islander people and other key stakeholders.
- Coordination across projects, agencies, and levels of government, involving an environmental scan of other relevant programs, baseline studies and evaluation processes.
- Creation of governance groups to oversee the evaluation process, particularly when evaluation involves several Government agencies.
- Setting aside adequate time and resources for evaluation, including building evaluation capacity in Aboriginal communities and/or organisations.
- Employing dedicated in-house evaluation practitioners and providing a level of expertise in Government agencies, which can be drawn on to develop a range of high quality policy and program evaluations.
- Training for evaluators, incorporating best practice evaluation and cultural competence, to improve the standard of evaluations.
- Contracting specialist, external evaluators on a case-by-case basis.

In what circumstances is evaluation of policies and programs unlikely to be feasible or cost-effective?

For some small-scale programs, it may not be cost-effective to undertake an evaluation. There may also be circumstances where necessary input from Aboriginal or Torres Strait Islander people, or sources of other essential data, cannot be obtained, rendering the evaluation infeasible or its results unclear. For example, if the program or service has been introduced with no community engagement or sense of Indigenous ownership, and Aboriginal and Torres Strait stakeholders are unwilling to engage in the evaluation, evaluators may conclude the service is not meeting its objectives, but not necessarily understand all the reasons why.

These potential problems underscore the importance of holistic co-design throughout the life-cycle of a policy or program, with Indigenous stakeholders being consulted in the design, implementation and evaluation stages. If this principle is applied effectively, these barriers to evaluation will likely be reduced.

What can we learn from evaluation systems and practice at the state and territory level?

WA supports the implementation of best practice evaluation. Key principles of best practice evaluation include:

- *Early planning:* An evaluation plan or framework should be developed as part of the program/policy design and implementation stage, noting it is important evaluation discussions and planning occurs early, rather than at the end.
- *Clearly defining evaluation purpose, scope and approach:* This is a key step in ensuring the intention and approach of the evaluation is determined and agreed by relevant parties. Without clear direction, the evaluation may lack focus and not produce a meaningful or informative product. Objectives should be clear and easy to understand.
- *Clearly articulating data requirements, collection, storage and analysis processes, and access arrangements:* The absence of baselines, limited data or inability to access datasets are common reasons why evaluations are not completed in a timely manner or key evaluation questions cannot be answered. To limit the chance of this occurring, it is important data requirements are documented in the evaluation plan and included in relevant contracts, and data sharing arrangements are finalised prior to the evaluation commencing.
- *Outcomes measurement framework:* Clearly articulate program/policy-level outcomes which are time-bound and measurable.
- *Establishing an evaluation team and budget:* Due consideration should be given to adequate resourcing to allow the evaluation to be undertaken.
- *Clearly communicating evaluation findings and articulating an implementation approach:* Throughout the evaluation, it is important to keep relevant stakeholders informed. An implementation plan will assist with progressing the decisions made as a result of the evaluation findings.
- *Sharing of evaluation findings:* Where appropriate, to support knowledge sharing and capacity building, the evaluation reports should be shared within government, and published when possible. Feedback from evaluations should also be provided to the relevant stakeholders.

An overarching element guiding the development and implementation of these evaluation steps is engagement and collaboration and co-design with Indigenous stakeholders, to ensure they are involved in the process and are afforded the opportunity to shape it.

Outcomes assessment is a key feature of most evaluations. To support this, it is important to clearly determine an outcomes measurement framework, as there can be differences between government and community expectations. Measuring long-term outcomes can be complex with issues of attribution. This will be a key consideration when assessing the impact of mainstream programs for Aboriginal and Torres Strait Islander people. Where possible, options to align outcomes measurement to existing processes should be considered (e.g. to the Closing the Gap Refresh).

In Western Australia, the Department of Treasury has developed an Evaluation Guide for use by WA Government agencies undertaking the evaluation of government funded programs to support a consistent approach to program evaluation. The Evaluation Guide provides detail on the role and importance of conducting program evaluations, considerations for evaluation prioritisation and approach, the different types of evaluation and the key stages of evaluation. It also includes some example templates such as an evaluation plan.

To support evaluation practice, the Department of Treasury also engages with agencies as required to provide feedback on evaluation approaches, plans, outcomes measurement frameworks and reports. It leads a formal Community of Practice on Evaluation, comprising representatives from WA Government agencies where evaluation-related issues are regularly discussed.

Additionally, all new programs (or extensions of existing programs) that impact the State's net operating balance by \$5 million or more in any one financial year are subject to a Sunset Clause. For qualifying programs, this means a cessation date is applied to funding, an evaluation plan developed and a program evaluation completed. The continuation of a program subject to a Sunset Clause beyond the cessation date is dependent on further consideration by Government, informed by the program evaluation.

How do we better enable Aboriginal and Torres Strait Islander organisations to lead evaluation and strengthen their evaluation capability?

A key component of evaluation co-design is ensuring that Aboriginal and Torres Strait Islander organisations have sufficient capacity to engage in evaluation design and implementation, and ideally take a lead role in this process.

To this end, it is critical for Government agencies to partner with the organisations to identify what evaluation skills they currently possess, and formulate ways to develop and build on these skills. Evaluation training and facilitation have the potential to increase leadership opportunities, and the capacity of Aboriginal and Torres Strait Islander organisations to engage in or lead evaluations.

For example, the Lowitja Institute has developed the Facilitated Development Approach which aims to mediate relationships between researchers/evaluators, the Aboriginal health sector and Government agencies, brokering the involvement of Aboriginal and Torres Strait Islander people in research and evaluation processes.

A similar model is for Aboriginal organisations to partner with other non-government organisations with expertise in evaluation.

How effectively do government agencies work with Aboriginal and Torres Strait Islander organisations when evaluating policies and programs? What can agencies do better?

This is an area that requires significant improvement. Aboriginal and Torres Strait Islander organisations recount experiences of being kept in 'silos', with a lack of transparency and genuine engagement in the evaluation of policies and programs impacting them.

As noted above, evaluations should involve the principle of co-design with Aboriginal representatives, supporting their involvement in the evaluation process and ensuring their perspectives are incorporated. A prerequisite for this engagement is a deeper understanding of Aboriginal culture in Government agencies, including by those involved in evaluating policies and programs, so that evaluation design and implementation are culturally appropriate and responsive to the priorities of Indigenous stakeholders.

What principles should be included in an Indigenous evaluation framework to be used by Australian Government agencies?

How should an Indigenous evaluation framework differ from a general evaluation framework for government policies and programs?

WA agrees with and supports the principles outlined in the Issues Paper. The principles of partnerships, participation, engagement, collaboration, shared responsibility, cultural competence and empowerment are particularly pertinent for an Indigenous evaluation framework. It would be anticipated that, through a process of co-design with Aboriginal and Torres Strait Islander people and organisations, particular evaluation principles will be given emphasis on a situational basis.

The strategy should emphasise the importance of transparency, accountability and the influence of an evaluation on decision-making. Even excellent evaluations are of limited benefit if their results are not made available to decision-makers and stakeholders so that future decisions can be informed by evidence.

A further important principle that should be included in the Indigenous evaluation framework is flexibility. As noted above, this principle should be applied to the choice of evaluation approach and when seeking the views and input of particular Aboriginal stakeholders in evaluation design and implementation. Evaluations also need to be adaptable and responsive to a wide range of place-based circumstances.

This is particularly important in a state the size of Western Australia, where a Government policy or program can affect Indigenous communities in widely divergent ways across the regions. The effective evaluation of these policies and programs necessitates the engagement of these communities or organisations at the local level. Building this level of flexibility into the Strategy will accommodate a range of contexts around Australia.

What are the barriers to further increasing engagement with Aboriginal and Torres Strait Islander people during Australian Government evaluation projects?

Historical barriers include the impact and effects of colonisation, inter-generational trauma and a distrust of Government. A perceived or actual lack of cultural competency in the public service may heighten this level of distrust. In some cases, proper engagement also means giving up a degree of control by Government agencies, which can be viewed as a risk and a disincentive to engage.

Engagement with Aboriginal and Torres Strait Islander people also takes time and commitment to establish trusting relationships. This is often lacking in evaluation projects, as for example might occur if there are political directives to undertake an evaluation expeditiously. Poorly designed evaluations, which do not allow time or resources for meaningful engagement, can be interpreted as disrespectful and tokenistic by Aboriginal and Torres Strait Islander people, and generate a reluctance to participate.

It should also be noted that English is not always a first language in some Indigenous communities. The planning, time and resources required to engage with appropriate interpreters can often create barriers to consultation.

One issue that is particularly prevalent in Western Australia is the large number of Aboriginal communities located in remote or very remote areas. This can create logistical and geographical challenges to engaging and consulting with key Aboriginal stakeholders in the evaluation of policies and programs. These challenges should be considered and addressed early in evaluation planning.

Do existing ethical guidelines for evaluation and research provide sufficient guidance for evaluation commissioners, evaluators and participants in evaluations of programs affecting Aboriginal and Torres Strait Islander people? To what extent should the Indigenous Evaluation Strategy build in these guidelines?

Numerous guidelines exist on ethics for evaluation and research involving Aboriginal and Torres Strait Islander people. These include the *Guidelines for Ethical Research in Australian Indigenous Studies* (2012) by the Australian Institute of Aboriginal and Torres Strait Islander Studies, and the *Guidelines for the Ethical Conduct of Evaluation* (2013) by the Australian Evaluation Society.

These documents would likely provide a sufficient starting point in most cases. The extent that they need to be built into the Strategy will be influenced by the scope of the Strategy.

In what circumstances should evaluation projects be subject to formal ethics review? In what circumstances should evaluation projects be exempt from formal ethics review?

What are the time and cost implications of embedding an ethics review process into Australian Government evaluations?

Not all evaluations involving Aboriginal and Torres Strait Islander people would require a formal ethics review. Including an ethics review process in an evaluation can have significant time and cost implications. This, plus the fact that most ethics committees only meet a few times a year, can add months to an evaluation project. Formal ethics review might, however, be appropriate in circumstances where particular evaluative approaches are likely to have impacts on participants.

It may be beneficial to establish through the Strategy a set of guidelines for Government agencies, to assist them in determining when and how their policies and programs should be subject to formal ethics review.

How can the cultural capability of evaluation commissioners and practitioners and their respect for Aboriginal and Torres Strait Islander culture, knowledge, history and values be demonstrated and improved?

Some options for improving the cultural capability of evaluators include:

- ensuring that commissioners and practitioners work directly with Aboriginal and Torres Strait Islander people in developing and assessing evaluation methodologies;
- working with Indigenous consultants or trusted partners, who can advise on cultural competency or safety;
- employing and/or promoting Aboriginal and Torres Strait Islander people into positions of commissioner and practitioner, supported by evaluation training and mentoring;
- commissioning external Indigenous evaluators, and/or other evaluators who have expertise in engaging with Aboriginal stakeholders; and
- documenting and sharing lessons learned from evaluations, within and between Government agencies, particularly in regard to engaging with Aboriginal and Torres Strait Islander stakeholders.

To what extent does a lack of high quality, accessible data, including data gaps, act as a barrier to undertaking effective evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people?

To what extent are current data governance arrangements effective? What can be done to improve arrangements?

These are significant barriers. As the Issues Paper notes, there are frequently major gaps in data relating to Aboriginal and Torres Strait Islander people, as well as difficulties relating to data quality. Data governance is also not currently well managed, with data sets often poorly linked together and Government agencies having limited capacity to isolate regional or local datasets, which are often critical for effective policy and program evaluation.

Compounding these problems is that data collection is frequently an after-thought in policy and program design, further hampering evaluation. As noted above, clearly articulating data requirements and processes at the commencement of the project or policy can help to mitigate this difficulty. However, this will not by itself address the broader challenges associated with data gaps and governance arrangements.

In Western Australia, privacy and responsible information sharing reform is currently underway to improve Government performance in these areas. Governance arrangements should address not just government use of data, but collection and flow of data from and to third parties, and Aboriginal communities or organisations.

A key element of reform in this area is to develop data literacy skills and data governance skills in both government and Aboriginal communities/organisations.

An Indigenous Data Strategy that is a part of, or aligned with, the Strategy, could assist in addressing all of these issues.

Should all evaluation reports be published? In what circumstances might it be appropriate to not publish evaluation reports?

Where possible, evaluation reports should be published for reasons of accountability and transparency, but this will not be necessary or appropriate in all instances. For example, some evaluation reports may not meet minimum quality standards, or complications may arise from issues of confidentiality, privacy and data ownership, rendering the publication of an evaluation report problematic.

Where publication is not appropriate, evaluation reports should nevertheless be provided to the Commonwealth Department of Treasury and the Productivity Commission (and, potentially, a future Indigenous Voice to Parliament), to ensure the value of the evaluation exercise is not lost.

In addition, the communication of evaluation findings may need to be tailored to different audiences, with the publication of reports not always being the most appropriate method of communicating evaluation findings to some Aboriginal or Torres Strait Islander communities.

In some instances, a summary of an evaluation report might be published as an alternative to full publication, and/or follow up meetings could be held to share evaluation findings with communities.

What mechanisms currently exist for sharing evaluation results and data with Aboriginal and Torres Strait Islander evaluation participants? Are these effective? How could they be improved?

It appears there are no consistent approaches to sharing results and data with Aboriginal people. Sharing should aim to target audience needs. For some Aboriginal and Torres Strait Islander communities, appropriate methods might include verbal feedback, community workshops or information sessions. Having Aboriginal and Torres Strait Islander people engaged in the development of the evaluation framework, and considering the sharing of evaluation results during the evaluation design phase, can offer opportunities to address this issue up front.

What principles should be used to determine evaluation priorities?

What policies and programs affecting Aboriginal and Torres Strait Islander people (or broader policy and program areas) should be the highest priority for evaluation, and why?

The Strategy should align with the evaluation requirements for the Closing the Gap Refresh, which will establish the primary criterion for determining evaluation priorities under the Strategy. This will ensure that:

- programs and policies which have significant impacts on outcomes for Aboriginal and Torres Strait Islander people are evaluated;
- Indigenous perspectives of priority-setting will be heard and incorporated through the Closing the Gap consultation and accountability architecture;
- more consistency will be applied to the evaluation of programs and policies affecting Aboriginal and Torres Strait Islander people;
- duplication of evaluation efforts will be minimised; and
- the overall system of programs affecting Aboriginal and Torres Strait Islander people, and the interactions among these programs, will be considered.

Beyond alignment with the Closing the Gap domain areas, minimum criteria for determining evaluation priorities would include an assessment of:

- policies and programs that Aboriginal and Torres Strait Islander stakeholders consider to be high priority for evaluation;
- strategic alignment to Government objectives, and whether the program is being considered for discontinuation;
- program size, scope, complexity, expenditure and type/stage (for example, it is highly recommended that pilot programs are evaluated to assess their feasibility and potential scalability);
- the existence of a non-voluntary component (e.g. cashless welfare card, banned drinkers register, etc.); and
- degree of risk (e.g. to Aboriginal communities and Government).

In terms of the Strategy's initial rollout, there may be merit in selecting a mixture of program types for evaluation, to test it in various different contexts and increase the breadth of the information obtained.

What approaches and models could be implemented to ensure that Australian Government agencies comply with the Indigenous Evaluation Strategy?

How should agencies' conduct against the Strategy be monitored?

One option could be for a national evaluation support body (which might sit within the Productivity Commission) to be tasked with providing direction, support and leadership to agencies in monitoring and ongoing improvement in evaluation, including training in evaluation standards.

This body could also conduct reviews of agency evaluations to ensure that their approach is consistent with the Strategy.

Monitoring agency conduct against the Strategy would require, at minimum, information about which programs in each agency should be subject to the Strategy, which of these are the subject of some form of evaluation, and what the results of those evaluations are. Cooperation between the Commonwealth Department of Treasury and the Productivity Commission may assist in assembling this information. Assessing the quality of individual evaluations would necessarily be done on a sampling basis.

Less formal reward-based strategies to improve compliance can also be considered, such as annual awards for excellence in evaluation practice.

<i>How and who should we engage to maximise community and expert input to this project?</i>
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The Productivity Commission may wish to directly approach Aboriginal community controlled organisations, either individually or through relevant peak bodies, to seek their input into the further development of the Strategy.

This engagement could potentially involve the facilitation of regional forums, with representatives from these organisations and other key stakeholders invited to workshop the Strategy. This will provide a greater opportunity for Aboriginal and Torres Strait Islander people to shape the Strategy.

The Western Australian Government is willing to assist by providing specific contacts if required.