



# Indigenous Evaluation Strategy:

ICV response to the Productivity Commission Issues Paper

June 2019



## Executive Summary and recommendations

The Indigenous Evaluation Strategy (the Strategy) provides a pivotal opportunity to improve the outcome of government programs and services that impact First Nations people. Public expenditure on government programs should be informed by, and reported on, using good practice evaluation.

Importantly, evaluation in First Nations contexts should adhere to the Australian Government's endorsement of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and First Nations Peoples' right to self-determination. This should be foundational to the Strategy. This commitment should be formalised through a governance structure for the Strategy whereby First Nations people and organisations are equal partners in the design of the Strategy as well as ongoing assessment of adherence to, and broader review of, the Strategy.

Over the past six years, ICV has invested in evaluation capacity building and the design of an inclusive, culturally safe and relevant evaluation approach to contribute to better outcomes for First Nations Peoples. This is explored further below, with implications for how elements of ICV's national monitoring and evaluation program, working across a variety of contexts, could be scaled.

ICV's evaluative capacity building approach also provides a model that demonstrates the benefits of investment in the evaluation capacity building of a First Nations organisation: it further strengthens First Nations Peoples' rights to self-determination through leading the evaluation design and delivery; it increases transparency to program participants; it strengthens local governance structures; and enables immediate lessons from evaluations to be incorporated in program delivery.

The importance of incorporating an evaluation approach in the design of programs cannot be understated. This should include an explanation of how First Nations Peoples' right to self-determination and good ethical practice has been included in the design and will be demonstrated throughout delivery. The Strategy can define the critical role First Nations people should have in this process through genuine co-design. The inclusion of First Nations Peoples in the design of programs and evaluations, as well as good ethical practice and principles of self-determination should be formalised in New Policy Proposals (NPPs).

As part of its principles based approach, the Strategy should include ethical principles and protocols, drawing on relevant research, codes and protocols developed for First Nations contexts within Australia.



#### **Recommendation 1**

**The UNDRIP and self-determination should be the foundation of the Indigenous Evaluation Strategy.**

#### **Recommendation 2**

**The Commission should formalise the role of First Nations governance within the Strategy as a whole and within each evaluation undertaken. The Commission should consider a representative model of First Nations governance drawing on the expertise of First Nations research and evaluation organisations to oversee the Strategy with the Commission as equal partners.**

#### **Recommendation 3**

**Inclusion of First Nations Peoples in program design and evaluation should be a mandatory principle of the Strategy. The Strategy should offer a range of options to apply the principle, with examples of the most appropriate application based on the type and scale of the program.**

#### **Recommendation 4**

**The Indigenous Evaluation Strategy should include a requirement for agencies to invest in the evaluative capacity building of service delivery providers and grant recipients, prioritising First Nations organisation.**

#### **Recommendation 5**

**Agencies should work with service delivery providers and grant recipients to understand their existing monitoring functions and capabilities and draw on these wherever possible, rather than creating additional administrative burdens in reporting and evaluation requirements.**

#### **Recommendation 6**

**All New Policy Proposals (NPPs) should demonstrate their approach to include First Nations people in the genuine co-design of the program and its monitoring and evaluation plan. This should include realistic timeframes required to facilitate the co-design process if it has not already been undertaken.**

#### **Recommendation 7**

**All New Policy Proposals (NPPs) should include a monitoring and evaluation plan congruent with the size and scale of the program, including the collection of a baseline. The plans should demonstrate how ethics will be adhered to and how principles of self-determination will be applied, realistic timelines, budget and any evaluation capacity building required.**



#### **Recommendation 8**

**All programs and evaluations should include objectives and indicators of success as defined by those impacted by the program.**

#### **Recommendation 9**

**Ethical principles for the Indigenous Evaluation Strategy should be developed in accordance with the UNDRIP and rights relating to self-determination. The principles should be based on existing protocols and codes developed for evaluation in First Nations context in Australia.**

#### **Recommendation 10**

**Ethical principles should be presented in a simple format to encourage agencies to use and apply them. The roll-out of the principles should be supported with the development of tools, checklists, graphics and examples of good ethical practice. Ongoing training on the principles should be provided to agency staff involved in program design and evaluations.**

#### **Recommendation 11**

**The commissioning process for all evaluations should consider the ethics of an evaluation, including whether the evaluation requires review from an ethics committee. Adequate time and funding should be allocated to all evaluations to accommodate good ethical practice.**

#### **Recommendation 12**

**Agency staff responsible for commissioning evaluations should receive cultural capability training as well as specific training on the ethical conduct of evaluations in First Nations settings.**

#### **Recommendation 13**

**All external evaluations should include an assessment of ethical practice and adherence to the UNDRIP and principles of self-determination.**

#### **Recommendation 14**

**All external evaluation reports should require publication or a cross-agency forum to consider the results. The forum should include First Nations people, and relevant stakeholders. Consideration should be given to recording and transcribing these forums and publishing the transcripts. At minimum a summary of the discussion should be published.**

#### **Recommendation 15**

**All external evaluation reports should require the publication of a response from management within a clearly defined, reasonable timeframe. Cross-agency responses should be published centrally to ensure accessibility, transparency and the benefits of wider learning.**





## ICV's approach

ICV is an Aboriginal and Torres Strait Islander community development and research organisation.<sup>1</sup> Since it was first established, ICV has delivered over 4,700 projects and more than 3,000 volunteers have registered with ICV. In 2018-19 ICV engaged with 200 communities and worked on 187 community-led projects.

In ICV's approach communities have control, they invite the ICV team in. Communities prioritise and decide on the work to be done. Working only at invitation, where communities design and own the activities, ICV facilitates empowerment, genuine buy in and long-term results. In ICV's approach:

- Community expertise and ICV's cultural capability and community development knowledge combine with volunteers that have specific skills and expertise to deliver projects requested by the community.
- Change is driven by the people who are living in the community. The solution comes from their own lived experience.
- Capability development is key. ICV supported projects facilitate meaningful and relevant learning.
- Through problem solving and co-design communities gain an understanding of their capabilities, what existing assets they can tap into in their region and where they need additional support and learning.
- Because of the ownership within the community there is increased transparency and accountability around decision making and governance of work.
- Monitoring and evaluation is built into each project, and where multiple projects are undertaken, monitoring and evaluation of long-term community aspirations is included.

The opposite of ICV's approach is where communities are told they have problems, are told what to do or that someone else is coming to fix it. In this scenario, communities have no control, no input on decision making and people feel excluded and disempowered. This results in no buy in, no ownership and no sustainability and often times, a welfare mentality.

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<sup>1</sup> ICV is funded through government support and fundraising activities. Over 75,500 people have generously given to support the work of ICV.



## ICV's Community Development Framework

ICV's Community Development Framework documents over 15 years of acquired knowledge and experience in community development practice. The Framework reflects ICV's commitment to continual improvement in community development practice in Australia. The framework consists of a cycle of five interconnected areas.

Executive community development staff and a working group of six community development practitioners from across Australia have contributed ideas, techniques and case studies to document the ethos, practice and wealth of ICV experience.

The Framework takes account of what has worked, and what doesn't, to achieve change that is desired, designed and owned by Aboriginal and Torres Strait Islander communities.

ICV's Story of Change (below) is a visual representation of the social and economic impact ICV achieves. In the short term, ICV's approach achieves improvements in organisational leadership and governance capabilities as well as community participation leading to improved outcomes in education, family and community safety, economic well-being and stronger country and cultural well-being.



## ICV'S STORY OF CHANGE





## ICV's monitoring and evaluation

Over the past six years ICV has been intentionally building an inclusive, culturally safe and relevant evaluation approach to contribute to better outcomes for First Nations Peoples.

Participatory monitoring and evaluation is built into the practices of the organisation to improve measurement and capture outcomes with communities. A culture of evaluation has been created, generated from the Board, CEO and leadership team, and continually driven and improved by operational staff. Field staff receive ongoing support and guidance in monitoring practices, regularly reflecting on the findings of internal evaluations as a group.

An independent assessment of the evaluation capacity building approach was undertaken in late 2017. It found that the principles of inclusion, flexibility, empowerment, ownership and effective communication were essential to the transformation of the organisation. An article, 'Demonstrating the value of community development - An inclusive evaluation capacity building approach in a non-profit Indigenous organisation' outlining the evaluation capacity building approach and results of the assessment can be found at <https://doi.org/10.1177/1035719X18803718>.<sup>2</sup> The learnings from this process will be drawn on in the response below.

## Objectives of the Strategy and self-determination

The Letter of Directive suggests the key objective of the Strategy is to improve outcomes for Aboriginal and Torres Strait Islander people. Directing public funds to this measure is best informed by good evaluation practice across government agencies. There is an urgent need to understand what is working, what isn't, what is doing harm, and why.

Tackling these questions without the voice, perspective and cultural lens of First Nations people will result in ill-informed policies and programs.

An Indigenous Evaluation Strategy provides the opportunity to establish a principles based approach to ensure that the perspective and knowledge of First Nations Peoples is driving the change and that funding prioritises the solutions First Nations Peoples are presenting. First Nations people are experts on their communities and should hold decision-making power regarding the design and delivery of programs that will impact on them.

Self-determination of First Nations Peoples and the UNDRIP should be foundational to the proposed Strategy. The Australian Government has endorsed the UNDRIP.

## Recommendation 1

**The UNDRIP and self-determination should be the foundation of the Indigenous Evaluation Strategy.**

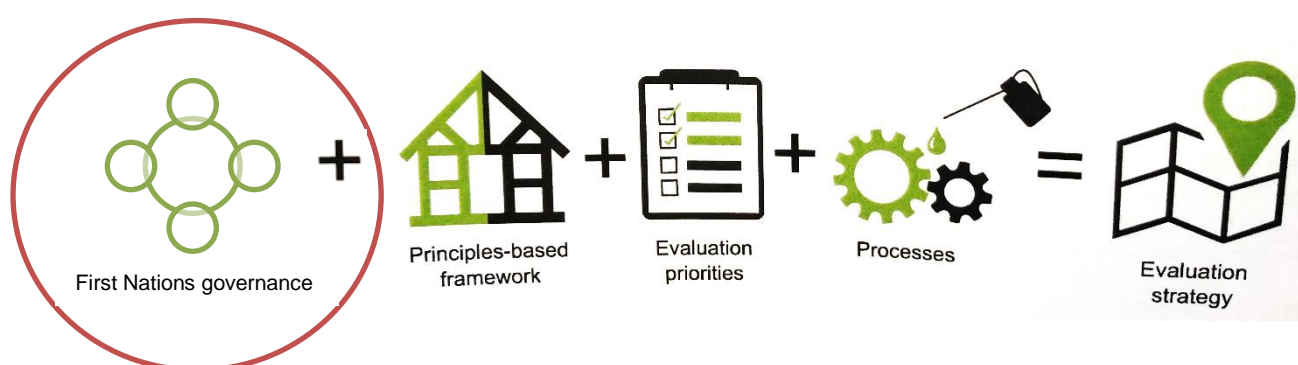
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<sup>2</sup> Rogers, A., Radcliffe, D., Babyack, S., & Layton, T. (2018), 'Demonstrating the value of community development - An inclusive evaluation capacity building approach in a non-profit Indigenous organisation', Evaluation Journal of Australasia. Vol. 18(4), 234–255. <https://doi.org/10.1177/1035719X18803718>. Also available on request.

## The Commission's approach

The proposed Strategy includes a principles-based framework, evaluation priorities and processes (including ongoing review and compliance with the Strategy). One of the intentions of the Strategy is that “The role of Aboriginal and Torres Strait Islander people in evaluation will be an essential component.” (p. 4) In this regard, ICV proposes that the importance of this component is elevated in the design of the strategy. Rather than considering the role of First Nations People within the proposed three elements, ICV suggests the role of First Nations Peoples be added into the essential elements of the Strategy as per the revised Figure 1 from the Commission's Issues Paper.

**Figure 1 – Revised elements of an Indigenous Evaluation Strategy to include First Nations governance**



First Nations governance should be considered for the Strategy as a whole and for each evaluation undertaken. This will facilitate a practical application of the UNDRIP. The recently established Joint Council on Closing the Gap provides an example of how governments can develop partnership arrangements to facilitate shared decision-making.

As noted in the Commission's Issues Paper, “Improving self-determination may take the form of encouraging Indigenous self-governance at the local level, ensuring Indigenous participation in the design, delivery and monitoring of programs and building culturally-appropriate programs that incorporate and build on Indigenous peoples' own initiatives.” (p. 3)

## Recommendation 2

**The Commission should formalise the role of First Nations governance within the Strategy as a whole and within each evaluation undertaken. The Commission should consider a representative model of First Nations governance drawing on the expertise of First Nations research and evaluation organisations to oversee the Strategy with the Commission as equal partners.**

ICV welcomes the options the Commission has presented to incorporate First Nations knowledges, priorities and perspectives including:

- First Nations people leading and conducting evaluations.





- Co-design of evaluation plans including agencies, evaluators and First Nations people.
- Increasing involvement (and building capacity) of First Nations people in data collection and analysis.
- Privileging First Nations research methodologies.
- First Nations representation of project steering committees.
- Presenting evaluation results to First Nations stakeholders.
- Oversight by First Nations evaluation committees. (p. 30)

### Recommendation 3

**Inclusion of First Nations Peoples in program design and evaluation should be a mandatory principle of the Strategy. The Strategy should offer a range of options to apply the principle, with examples of the most appropriate application based on the type and scale of the program.**

## 1. Evaluation concepts and practices

Evaluation in First Nations contexts should be flexible, responsive and the findings accessible to those the evaluation will impact. This creates transparency and accountability to those impacted by the relevant program and evaluation as well as funders of the project, which, in the case of the Strategy, are Australian tax payers.

ICV agrees with the Commission, that “the choice of [evaluation] approach should take into consideration the evaluation’s purpose, the nature of the program or policy, its stage of implementation, resource constraints including budget, time and data, and the target population or group.”

On a micro level, ICV provides an example of a strategy that considers these elements, working with 200 communities on 187 projects last financial year. Firstly, the purpose of ICV’s monitoring and evaluation is to improve its practice in order to achieve better outcomes for the communities it works with; and be transparent and accountable to communities and its funders.

Secondly, ICV’s budget and timelines are considered in light of its commitment to the following:

- All projects assessed against ICV’s ethical principles before proceeding.
- Projects align with community priorities and are co-designed with communities.
- A monitoring plan established as part of the project design.
- All projects to collect a baseline reading including quantitative and qualitative data.
- All projects monitored carefully throughout (informally and formally), ICV and communities can respond to findings immediately, rather than waiting for a formal evaluation report.
- All projects to collect a final monitoring point with quantitative and qualitative data.
- A final evaluation conducted for each project. This includes a triangulated reflection consisting of perspectives and recommendations from the community development field officer, a community



representative or group, and any volunteers involved. A Regional Manager undertakes a final assessment of the project.

- At the end of each project, the community is provided a summary report of the project including a visual representation of the monitoring points using the quantitative measures.
- Where a community invites ICV to work with them on multiple projects, an extended monitoring and evaluation plan is designed that measures progress towards community identified longer-term indicators of success.

Meta-analysis of this information is required for ICV's annual report and reports to funders and donors. In addition to the above, based on resources available, the ICV Impact and Strategy unit aggregates and collates this information for:

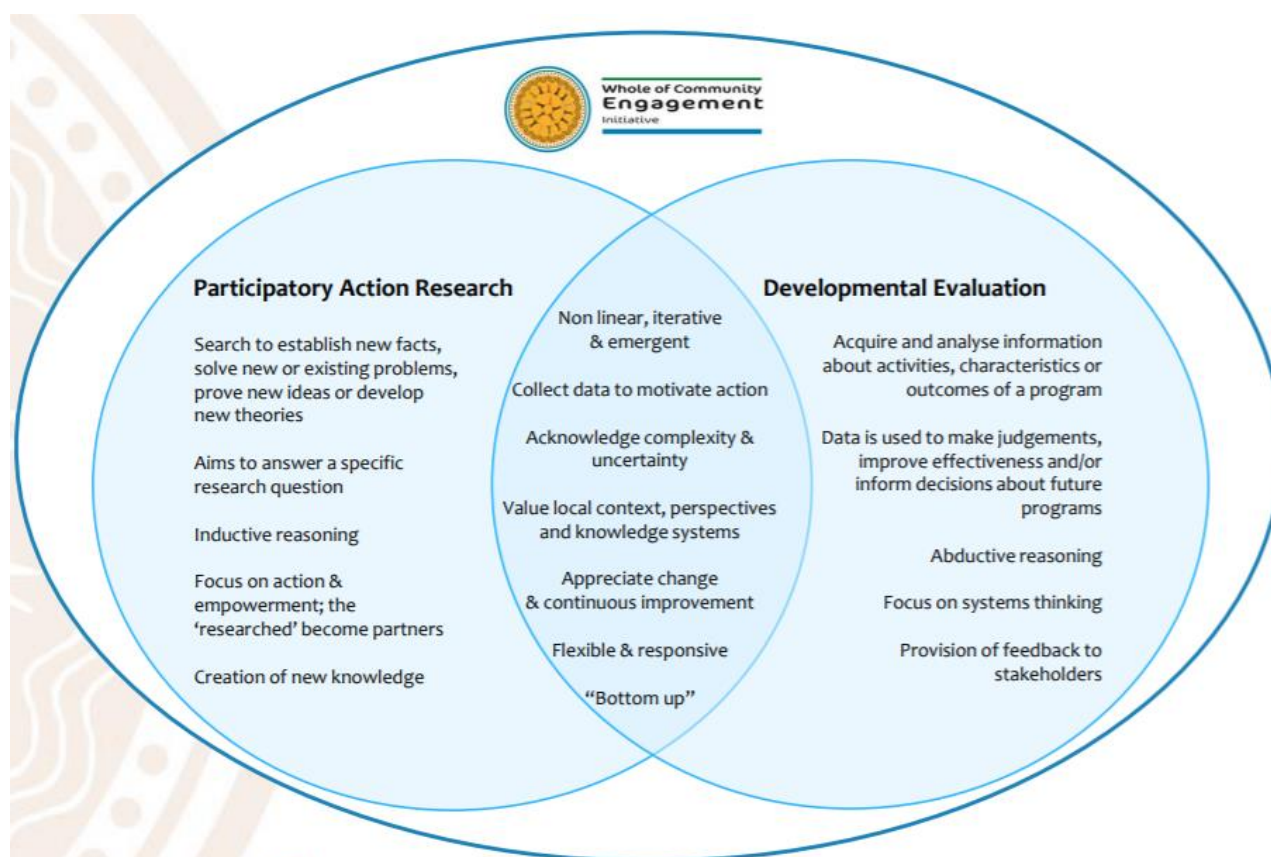
- co-authored case studies with communities;
- regular internal learning and development forums;
- in-depth research studies on key emerging themes based on community demand of ICV support; and
- commissioning external evaluations utilising the data collected.

Given the purpose of ICV's evaluation framework, timelines, budget and resources available, ICV uses a participatory monitoring approach as it suits the nature of the program at any stage of an evaluation. One of the driving purposes for selecting this approach was that it aligned with ICV's ethical principles for communities to hold decision-making powers on whether projects should proceed and how they are designed, delivered and evaluated. It is inclusive and creates the space to build trust where honest answers are provided to inform project design and evaluation. A participatory approach can also accommodate First Nations evaluation methods where this is preferred.

Participatory monitoring accommodates a variety of evaluation methods to adapt to the unique context of each community. ICV is increasingly using photography, audio and video recordings. These provide concrete evidence of the impacts of projects. As an internal evaluation process, reflections and evaluations on the impact of a project are subjective. However, direct quotes from community members and volunteers provides a more objective assessment of ICV's involvement and how the program can be improved

The evaluative aspects of ICV's approach could best be described as a combination of Participatory Action Research and Developmental Evaluation as outlined at Figure 2.

**Figure 2. Participatory Action Research and Developmental Evaluation<sup>3</sup>**



## Challenges

Due to the collaborative approach ICV takes, a key challenge to evaluation is attribution. With communities leading and driving the work, ICV intentionally takes a support role, with the wins attributed to community members themselves. ICV is exploring this challenge more through its research, using acknowledgements to reflect the roles within the co-design and delivery of projects and research has been important.

Designing a counterfactual is another challenge. ICV does not undertake monitoring and evaluation in communities where it is not operating and therefore, a control group for comparison is not an option. Choosing not to support a community, but to evaluate it would also raise ethical barriers for ICV. As a result, ICV's program has not been compared to a 'control group'. Instead, ICV draws on the assessment of 'key informants' (community members) at project end to assess whether the change would have occurred without ICV support. In addition, ICV relies heavily on the collection of a baseline at the start of each project.

BetterEvaluation notes that a counterfactual can be constructed logically, where a comparison group is not possible. A baseline can be used as an estimate of the counterfactual "where it is reasonable

<sup>3</sup> Smith, J., Lowell, A, 'Combining participatory action research with developmental evaluation approaches: Do they align?', <https://remotengagetoedu.com.au/resources/reflections-on-participatory-action-research-in-indigenous-higher-education-research/> (accessed 23 August 2019).





to assume this would have remained the same without the intervention.”<sup>4</sup> The World Bank Review of the State of Impact Evaluation Independent Evaluation Group provides an example:

Sometimes before versus after is valid for impact analysis since attribution is very obvious, so that there is no need for a comparison group. An example of this is the Finnish water supply project and its impact on time taken to fetch water. The time households spent in fetching water fell once water pumps were located in the village. There is no other feasible causal factor so the before versus after comparison tells us the actual impact.<sup>5</sup>

Another challenge for ICV in undertaking internal evaluations is the need for greater independence for certain elements of its evaluation strategy. This is addressed through a number of options within the time and resources available:

- Contracting an external evaluator for specific projects, or working with a PhD candidate to conduct an independent assessment.
- Collecting a baseline, and monitoring projects throughout to collect and anticipate data needs of an external evaluator to minimise the cost and the imposition of an evaluation for communities and the ICV team.
- Using audio and video to record first-hand accounts of participants, rather than relying solely on self-assessment and evaluative observations.

In regard to challenges for agencies more broadly, the Commission’s overview of common evaluation challenges that may affect the Strategy is well considered (pp. 17-18). In particular, the obvious challenge of creating a Strategy that can be adapted across multiple agencies, programs and communities. Presented with a similar challenge, on a micro scale, the experience of ICV aligns with the Commission’s statement that:

In many cases, it will be possible to overcome some of these challenges — for example, by planning for evaluation early in the policy cycle..., or scaling the evaluation so it is proportionate to the policy or program under consideration. Indeed, expensive ‘gold standard’ evaluation is unlikely to be viable for small programs with limited budgets (although these low cost programs can be very successful so there may be benefit in conducting smaller scale evaluations)... (p. 18)

The Commission continues, ‘There will always be instances where evaluation is not feasible or cost-effective.’ (p. 18) In light of the evidence the Commission collects in its consultation process, it may

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<sup>4</sup> BetterEvaluation, ‘Logically constructed counterfactual’, [https://www.betterevaluation.org/evaluation-options/logically\\_constructed\\_counterfactual](https://www.betterevaluation.org/evaluation-options/logically_constructed_counterfactual) (accessed 23 August 2019).

<sup>5</sup> White, H., Sinha, S., & Flanagan, A. (2006). A Review of the State of Impact Evaluation Independent Evaluation Group, World Bank. Retrieved, <http://www.oecd.org/dac/evaluation/dcdndep/37634226.pdf> (accessed 23 August 2019).





be that the benefits of evaluation, and the many solutions put forward will extend the scope of feasibility and cost-effectiveness for evaluation across government.

For example, investing in the evaluative capabilities of service providers and agencies may facilitate an increase in monitoring and reflective practice where immediate lessons are incorporated into program delivery without waiting for a full-scale, independent evaluation. The return on investment for this approach may be higher as it has a wider reach and will yield a more sustainable approach in the longer-term.

### Social policy implications

From ICV's experience there are three elements to program operation and evaluation that are key to reducing the likelihood of harm, and increasing the likely success of a program:

1. Design and application of an ethical approach based on the agreed principles and protocols for the organisation, including the mandatory requirement of principles relating to self-determination and consideration of cultural capabilities.
2. Involve program participants in the design of the program including the monitoring and evaluation plan. Where a program is already underway, involve participants in the design and delivery of the monitoring and evaluation plan and approach.
3. Ensure objectives and indicators for monitoring and evaluation include community priorities, and program participants should be included in the evaluation of change that has occurred across all indicators.

The importance of careful program and evaluation design cannot be underestimated. ICV commends the approach of the Department of Industry, Innovation and Science's 'Evaluation Ready' approach for all new policy proposals to ensure programs are prepared for future monitoring and evaluation by setting out a theory of change, evaluation questions, indicators, and appropriate types and timings of evaluations. The Department's assessment of its own evaluation capacity building is also commended. (p. 29)

While ICV's evaluation strategy is a micro example, there are important lessons that can be readily scaled to the evaluation of government programs:

1. Clearly defined ethical principles for the organisation are required to minimise the risk of harm and adhere to the UNDRIP.
2. Organisational ownership of ethical principles is required to inform all decision-making processes and should be driven from the leadership. The application of these principles is achieved through their discussion throughout design, delivery and evaluation processes, they are not a one-off 'tick box' exercise.
3. An evaluative culture is created through ongoing learning and reflection, supplemented by formal training and information.
4. Understanding organisational and team motivations is key to building a culture of evaluation. The key driver for ICV has been the pursuit of higher quality practice and better outcomes for



First Nations Peoples, a secondary measure has been accountability and transparency to funders.

5. Evaluation within an organisation can extend beyond the assigned 'evaluators'. All people involved in the program can be encouraged to monitor and evaluate the performance of a program and provide recommendations on how it can be improved.
6. Regular evaluation and reflection meetings scheduled within the delivery of a program demonstrates the value of evaluation to members of the organisation. Structured monitoring and evaluation meetings can answer questions relevant to program delivery at a specific point in time and improvements to operations can be readily applied.
7. Designing a monitoring and evaluation plan at the commencement of all projects informs project design. Objectives and indicators of change are clearly defined, and an approach to understand the changes taking place can be embedded within the program.
8. Including the voice of community in the design phase of programs ensures objectives and indicators for monitoring and evaluation includes community priorities and expertise.
9. Those participating and impacted by the program are best placed to understand and record the changes taking place as a result of the program, in partnership with the provider as part of regular reporting procedures.
10. Video and audio recordings can provide rigour to internal evaluations as the voice of participants can be heard first hand.
11. Involving First Nations Peoples at each stage of the monitoring and evaluation process provides expertise on the local context.
12. Collecting a baseline reading at the start of each project is a key component to understanding the outcomes and impacts of a project. The baseline reading contributes evidence to an evaluation at the end of a project, regardless of the type of evaluation chosen.
13. A baseline reading may also inform the co-design process. Understanding the local context may result in early and important changes to the design of the project.
14. Participatory approaches and developmental evaluation allow for a range of methods to adapt to local context, and the ability to apply findings rapidly. This can foster innovation and locally driven solutions and governance.
15. Not all programs require a control group for comparison. Logical constructions of a counterfactual can be considered, drawing on baseline findings and/or the assessment of 'key informants' (experts in the program or community) that can predict what would have happened in the absence of the program.
16. Carefully designed, and simple, monitoring approaches can be embedded within the design of programs, utilising the expertise of communities and those delivering the program. This can be a cost effective approach and allow for evaluation at any stage of a program. Timelines for program delivery require some adjustment when the monitoring is built into program activities, the benefits and rigour added to the program offset this additional cost.



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#### **Recommendation 8**

**All programs and evaluations should include objectives and indicators of success as defined by those impacted by the program.**

### **A principles based approach to ethics, planning and engagement**

ICV welcomes the Commission's principles based approach and the important impetus it provides to improve the ethics that underpin government programs and improve agencies' engagement and planning processes. ICV agrees with the Commission that:

Adopting a principles based approach allows the framework to be adaptable to different kinds of evaluations, including evaluations of Indigenous specific and mainstream programs, as well as strategic or cross cutting evaluations, such as evaluation of the effects of a range of programs in a particular place or region, or thematic evaluations examining common themes across programs conducted across multiple agencies (for example, governance or family programs). (p. 24)



## Ethical conduct

Strong ethics underpin each decision of ICV's program from whether to engage with a community, to proceed with a project, how the project should be designed and how it will be delivered, monitored and evaluated and the findings communicated. Self-determination is central to the organisation's approach. The ethical principles, or this principle-based approach, is outlined in the two 'Stories of Practice' listed below. The tables at the end of the two studies demonstrate how the ethical principles of the Better Evaluation Ethical Protocols (referenced in the Commissions Issues Paper, (p. 27) have been applied at each stage of the evaluation.

The 'Stories of Practice' and using the BetterEvaluation Ethical Protocols provided an effective way of self-identifying where ethical principles had been applied, and where improvements could be made. The two case studies were also independently assessed by other working group members of the BetterEvaluation project and can be found at the following links:

- *Participatory Monitoring with Kungkas Can Cook*  
[https://www.betterevaluation.org/en/themes/indigenous\\_evaluation/examples/participatory-monitoring-kungkas-can-cook-2019](https://www.betterevaluation.org/en/themes/indigenous_evaluation/examples/participatory-monitoring-kungkas-can-cook-2019)
- *Participatory Monitoring with the Littlewell Working Group*  
[https://www.betterevaluation.org/en/themes/indigenous\\_evaluation/examples/participatory-monitoring-littlewell-working-group-2015](https://www.betterevaluation.org/en/themes/indigenous_evaluation/examples/participatory-monitoring-littlewell-working-group-2015)

As noted in the Commission's Issues Paper, existing ethical frameworks for working with First Nations Peoples have been developed (p. 27). Importantly, each of these include instruction on the development of cultural capability of evaluators and the respect and cultural humility required when engaging with First Nations Peoples and communities.

The research and consultation behind these frameworks could be leveraged and incorporated into the Strategy, in particular the AIATSIS Guidelines and the practical application of the BetterEvaluation Protocols are complementary.

The National Indigenous Australians Agency use of the AIATSIS Guidelines and ethics committee is commended (p. 32), noting that an ethics committee process is not required for all evaluations. The AIATSIS Guidelines provides guidance on when and where the ethics committee process should be used:

While all research must be ethical, not all research requires formal ethical review. Currently under the National Statement all research with Aboriginal and Torres Strait Islander people must be subject to ethical review by a qualified Human Research Ethics Committee.

The National Statement specifically excepts from review research involving the use of existing collections of data or records that contain only non-identifiable data. It is also often considered that desktop or archival research does not require ethical review.





However, in applying the AIATSIS Code of Ethics care should be taken as relevant ethical issues can arise in this kind of research. A precautionary approach should be applied and guidance from an ethics review committee with experience in Aboriginal and Torres Strait Islander research may be of significant benefit and should be sought.<sup>6</sup>

As a non-government organisation, with limited resources, ICV has first-hand experience of using the AIATSIS ethics committee and can attest to the additional time and resource required, as well as the benefits of the process. In particular, the process improved the design of the evaluation (in this case a participatory action research project across 13 communities). The required explicit description of how certain ethical aspects would be addressed allowed ICV to clearly articulate and define its approach. The expertise of the committee enhanced accountability and the design of the research project.

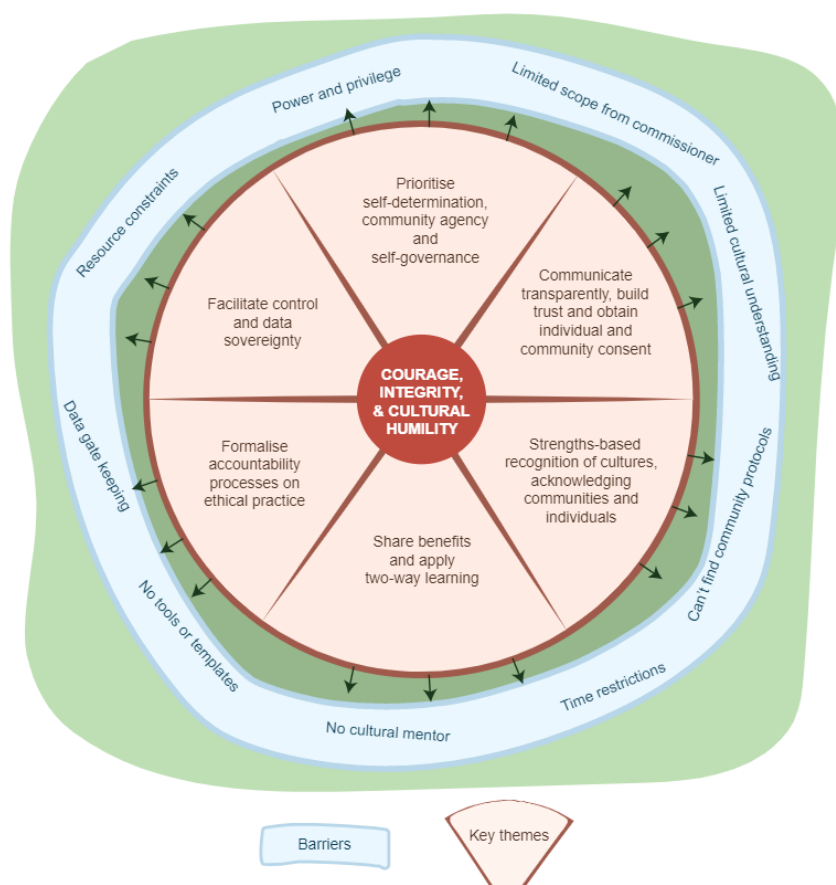
ICV was a member of the working group for the development of Ethical Protocols in Aboriginal and Torres Strait Islander contexts with BetterEvaluation. The protocols were designed to be applied as a whole and presented in a simple format that evaluators can readily apply in the typical stages of an evaluation (using the BetterEvaluation rainbow framework as a guide). Practical examples were given on how to apply the protocols.

As part of the process it was clear that the evaluation sector has a range of barriers to overcome. In particular, the need for commissioning processes to consider and mandate ethical practices and allow time and adequate budget for the ethical practices to be adhered to. Some of these barriers are considered below.

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<sup>6</sup> AIATSIS, '2019 Revision of the AIATSIS Guidelines for ethical research in Australian Indigenous studies, consultation draft', [https://aiatsis.gov.au/sites/default/files/docs/research-and-guides/ethics/consult/consultation\\_draft\\_guidelines\\_for\\_ethical\\_research\\_in\\_australian\\_indigenous\\_studies.pdf](https://aiatsis.gov.au/sites/default/files/docs/research-and-guides/ethics/consult/consultation_draft_guidelines_for_ethical_research_in_australian_indigenous_studies.pdf) (accessed 23 August 2019).

**Figure 3: Overcoming barriers to ethical practice in First Nations context<sup>7</sup>**



The Strategy provides an opportunity to place greater emphasis on good practice evaluation. The rigour and credibility of an evaluation that cannot demonstrate good ethical practice is questionable. An evaluation with good ethical practice, including consideration and development of cultural capability, is far more likely to facilitate a safe environment where participants can provide an honest account, as outlined in the pathway below.

**Figure 4. Pathway to improve benefits of evaluation for First Nations Peoples<sup>8</sup>**



<sup>7</sup> Gibb, B., Babyack, S. Stephens, D., Kelleher, K., Vale, C., Peersman, G., 'Better Evaluation 'Ethical Protocol for evaluation in Aboriginal and Torres Strait Islander settings, [https://www.betterevaluation.org/en/themes/indigenous\\_evaluation/ethical\\_protocol](https://www.betterevaluation.org/en/themes/indigenous_evaluation/ethical_protocol) (accessed 29 August 2019).

<sup>8</sup> Gibb, B., Babyack, S. Stephens, D., Kelleher, K., Vale, C., Peersman, G., 'Better Evaluation 'Ethical Protocol for evaluation in Aboriginal and Torres Strait Islander settings, [https://www.betterevaluation.org/en/themes/indigenous\\_evaluation/ethical\\_protocol](https://www.betterevaluation.org/en/themes/indigenous_evaluation/ethical_protocol) (accessed 29 August 2019).



### **Recommendation 9**

**Ethical principles for the Indigenous Evaluation Strategy should be developed in accordance with the UNDRIP and rights relating to self-determination. The principles should be based on existing protocols and codes developed for evaluation in First Nations context in Australia.**

### **Recommendation 10**

**Ethical principles should be presented in a simple format to encourage agencies to use and apply them. The roll-out of the principles should be supported with the development of tools, checklists, graphics and examples of good ethical practice. Ongoing training on the principles should be provided to agency staff involved in program design and evaluations.**

### **Recommendation 11**

**The commissioning process for all evaluations should consider the ethics of an evaluation, including whether the evaluation requires review from an ethics committee. Adequate time and funding should be allocated to all evaluations to accommodate good ethical practice.**

### **Recommendation 12**

**Agency staff responsible for commissioning evaluations should receive cultural capability training as well as specific training on the ethical conduct of evaluations in First Nations settings.**

## **Publication and application of results**

There are clear benefits to sharing evaluation results, including program improvement, shared learning across agencies and the broader sector, and accountability and transparency of public expenditure. There are a range of options to achieve these benefits discussed below, framed around internal and external evaluation approaches.

### **Internal evaluations**

Internal evaluation provides many opportunities for staff and program participants to learn from immediate lessons and incorporate the results into program delivery. Carefully designed and scheduled reflective forums ensure the learnings are collated and applied. These forums also provide the opportunity to share the learnings more broadly, through publications and presentations.

This is reflective of ICV's approach, to learn and apply. As discussed above, participatory action research and development evaluation facilitate this.



In Action Research, the intention is not to ‘create knowledge for knowledge’s sake but to aim to improve the quality of life by engaging people in a quest for improvement’.<sup>9</sup> As part of the cycle of Action Research, the research is part of the system of collecting data, analysing it and using it for action.<sup>10</sup>

An investment in the evaluative capacity of First Nations organisations in particular, provides further opportunity for First Nations Peoples and communities to lead evaluative processes through participatory action research and developmental evaluation.

An option to enhance the independence and objectivity of internal evaluative forums is to have an independent facilitator or evaluator prepare the questions, facilitate the forum and record the summary.

### External evaluations

While internal evaluations provide opportunities for learnings to be rapidly applied in program delivery, there remains an important role for external evaluations to provide further independence and objectivity.

ICV agrees with the Commission that publication of evaluation reports may not be desirable for a single geographic region or service provider and confidentiality and privacy should be upheld. However, a summary of the findings may still offer the benefits of shared learning and accountability.

Another form of publication could be to facilitate a discussion on evaluation findings across agencies and with relevant stakeholders. A transcript or summary of discussions could be published.

Critical to the publication of results is creating a “fail forward” environment across agencies to learn, accepting that all programs will have failures and room for improvement. The inherent influence of politics in programs and evaluations cannot be ignored. To overcome the lack of transparency in programs and evaluations, the Strategy would need to mandate an expectation regarding publication and formal management responses to evaluations.

For example, programs that cannot demonstrate adherence to ethical principles, self-determination and reflective learning, transparency and accountability should not be continued.

As a model of how this can be achieved, ICV commends the approach of the Office of Development Effectiveness at the Department of Foreign Affairs and Trade to mandate a management response to all evaluations. (p. 36)

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<sup>9</sup> Rowell, LL, Polush, EY, Riel, M and Bruewer, A, ‘Action researchers’ perspectives about the distinguishing characteristics of action research: a Delphi and learning circles mixed-methods study’, *Educational Action Research*, vol. 23, no. 2, pp. 243-270.

<sup>10</sup> Abraham, Selva, ‘Action research characteristics: in a work-applied learning for change context’, 2016.





It will take more than courage and goodwill to dismantle programs that are not transparent and accountable and do not adhere to the Australian Government's commitment to the UNDRIP and self-determination. This needs to be mandated and the Strategy provides an opportunity to do this.

#### **Recommendation 13**

**All external evaluations should include an assessment of ethical practice and adherence to the UNDRIP and principles of self-determination.**

#### **Recommendation 14**

**All external evaluation reports should require publication or a cross-agency forum to consider the results. The forum should include First Nations people, and relevant stakeholders. Consideration should be given to recording and transcribing these forums and publishing the transcripts. At minimum a summary of the discussion should be published.**

#### **Recommendation 15**

**All external evaluation reports should require the publication of a response from management within a clearly defined, reasonable timeframe. Cross-agency responses should be published centrally to ensure accessibility, transparency and the benefits of wider learning.**

### **Conclusion: design, adherence and review of the Strategy**

In closing, the Strategy presents an opportunity to formalise the UNDRIP and self-determination in the design and delivery of programs and evaluations across all agencies. Formalising the governance of the Strategy to include a partnership with First Nations experts is critical to its success (refer recommendations 1 and 2).

In the first instance, a formalised partnership with First Nations organisations and people is required to translate the findings of this consultation process into the design of the strategy, including how agencies will be assessed and ongoing formal review of the Strategy.