

21 Aug 2020

Mr Romlie Mokak
Commissioner
The Productivity Commission
4 National Circuit
Barton ACT 2600

Dear Mr Mokak,

Consultation submission on the draft Indigenous Evaluation Strategy and Guide to Evaluation

QAIHC as the peak body for the Aboriginal and Torres Strait Islander Community Controlled Health Organisations (ATSICCHOs) in Queensland, wish to express the collective views on behalf of its Members, in response to the draft Indigenous Evaluation Strategy (Strategy) and Guide to Evaluation (Guide).

QAIHC was established in 1990 by Aboriginal and Torres Strait Islander leaders within the community controlled health sector, to lead Aboriginal and Torres Strait Islander health and be a voice for our Members; the 26 ATSICCHOs, two regional bodies and 14 Affiliate Members. ATSICCHOs provide culturally appropriate, holistic, comprehensive, primary health care services across more than 60 services in Queensland.

On 30 August 2020, QAIHC provided a [submission](#) to the Productivity Commission in response to the Indigenous Evaluation Strategy Issues Paper. QAIHC acknowledge the Productivity Commission's consultation process with Aboriginal and Torres Strait Islander peoples and organisations and incorporating these views into the Strategy.

QAIHC believes that authentic, considered, community led and driven evaluation is critical to improving the health outcomes for Aboriginal and Torres Strait Islander peoples.

With this in mind, QAIHC strongly support the Strategy's ambitions to:

- provide a whole-of-government evaluation framework/guideline (a rigorous and appropriate evaluation process) for Australian Government agencies to use when selecting, planning, conducting and using evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people.
- ensure that Aboriginal and Torres Strait Islander peoples' perspectives, priorities and knowledge are at the centre of the evaluation of policies and programs.

Whilst there have been a number of positive actions incorporated within the Strategy, there remain some areas for improvement. QAIHC makes the following recommendations:

- 1. Ensure meaningful partnership and shared-decision making with Aboriginal and Torres Strait Islander peoples and their representatives (Aboriginal and Torres Strait Islander Community Controlled Organisations) at each level of decision-making (selecting, planning, conducting and using evaluations of policies and programs).**

The Strategy includes the importance of engagement, however QAIHC argue that this is not enough and needs to articulate how meaningful community partnerships are to take place. Partnerships are essential to effective community engagement, to enable communities to actively participate in shared decision-making at every level.

2. **Ensure all evaluations are aware of, and inclusive of, diverse perspectives and the knowledge of Aboriginal and Torres Strait Islander peoples across Australia, allowing for location-specific views.**

The Strategy refers to the diverse range of perspectives of Aboriginal and Torres Strait Islander peoples, however QAIHC believe this must be strengthened and further embedded into the Strategy to ensure that location-specific and culturally-specific views are incorporated.

3. **Ensure that government-wide evaluation priorities align with the National Agreement on Closing the Gap 2020-2030, including the four Priority Reforms and targets.**

QAIHC notes that the Strategy has proposed interim government-wide evaluation priority areas, based on the draft priorities established by the Council of Australian Governments (COAG) and the Joint Council Closing the Gap.

This will embed the principles that have been developed in genuine partnership between Australian governments and the Coalition of Aboriginal and Torres Strait Islander Peak Organisations (the Coalition of Peaks), to improve the life outcomes for Aboriginal and Torres Strait Islander peoples.

4. **Ensure that all evaluations commit to and are accountable to rigorous ethics review and show evidence that core values of the research guidelines are upheld.**

QAIHC notes that the Strategy has mentioned that not all evaluations will be subject to an ethics review. It is important that the Strategy adheres to the core values of research guidelines, completely, and every evaluation must follow the rigorous and appropriate ethics review process. This will ensure that research guidelines are upheld and that there is minimal risk to Aboriginal and Torres Strait Islander communities and individuals.

5. **Ensure statutory governance responsibility of the Strategy be determined jointly by the Joint Council on Closing the Gap and the government.**

QAIHC agrees that accountability is required to oversee the implementation of the Strategy and coordinate a whole-of-government approach to evaluating policies and programs. However, QAIHC's view is that creating a new government system (Office of Indigenous Policy Evaluation and Indigenous Evaluation Council) will take more resources and responsibilities away from the community-controlled sector. QAIHC recommend the statutory governance responsibility of the Strategy be determined following negotiation between the Joint Council on Closing the Gap and the government.

6. **Ensure that consistent language is used throughout the Strategy and people are referred to as Aboriginal and Torres Strait Islander peoples, and not Indigenous people.**

There are inconsistencies within the existing Strategy.

Please note that QAIHC have also contributed to and support the National Aboriginal Community Controlled Health Organisation's submission.

Thank you for the opportunity to respond to this consultation, please let me know if we can be of further assistance.

Yours sincerely,

Cleveland Fagan

Chief Executive Officer (Acting)

Queensland Aboriginal and Islander Health Council