Further submission from the Victorian Aboriginal Child Care Agency (VACCA) to the *Indigenous Evaluation Strategy, Draft* and *A Guide to Evaluation under the Indigenous Evaluation Strategy, Draft*

August 2020

1. Introduction

This submission provides VACCA's comments on the *Indigenous Evaluation Strategy, Draft* (IES Draft) and *A Guide to Evaluation under the Indigenous Evaluation Strategy, Draft* (IES Guide). If further detail is required, VACCA would welcome the opportunity to elaborate on our submission.

2. General comments

VACCA welcomes the release of the IES Draft and the IES Guide. There are many elements of the strategy and guide that reflect a significant commitment on the part of the Australian Government to change the way in which evaluations are designed, implemented and used within the Indigenous context. If implemented, the strategy should improve practice and result in better processes for service providers and users in engaging in evaluations, and the generation of evidence that is more useful to Aboriginal and Torres Strait Islander people, communities and organisations. VACCA welcomes:

- A principles-based approach
- Centring of Aboriginal and Torres Strait Islander people within the evaluation process
- Ensuring that evaluation is ethical and transparent
- The importance of evaluation capacity building
- Evaluation built in across program cycles
- The focus on utilisation of evaluation

By way of overall feedback, the guide and strategy would be strengthened if there is greater clarity provided in relation to the following:

- The impact of the strategy and guide relating to the different stakeholders in an evaluation, including Communities, Aboriginal Community Controlled Organisations, and other service providers;
- How Aboriginal and Torres Strait Islander leadership of evaluations will be assured;
- Resourcing for service providers and community organisations in supporting evaluations; and
- How the strategy will support evaluation capacity building not just within government agencies but also within ACCOs, and other organisations delivering services in partnership with the Australian Government.

3. Detailed Comments

The impact of the strategy on Aboriginal and Torres strait Islander Communities and organisations, including Aboriginal Community Controlled Organisations (ACCOs)

The strategy is aimed at government agencies and a range of other evaluation stakeholders, including individuals and communities who are *'recipients of the policies and programs being evaluated',* external evaluators, and service providers who *'deliver policies and programs who may be involved in collecting data,*

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identifying evaluation participants, participating in, and implementing recommendations from, evaluations', peak bodies and community representatives*.[1]*

This recognition of the range of stakeholders involved in designing, implementing and using evaluations is important. VACCA's 2019 submission to the Productivity Commission's Inquiry into Indigenous Evaluation Strategy asked how the strategy would be relevant to Aboriginal Community Controlled Organisations (ACCOs) implementing Australian Government funded programs. This question has still not been fully answered – and there is a need to provide further information on how the strategy and guide apply to the different stakeholders. VACCA's experience has demonstrated clearly that evaluations by government funding agencies draw significantly on service providers in implementation, as stated in our submission of August 2019. A common scenario for VACCA is that a government agency funding a program will commission the evaluation, use existing program data (both administrative and monitoring), and either conduct additional data collection activities or require that VACCA collect additional data to support the evaluation (surveys, for example). The Guide to the IES Draft section on Evaluation Planning, Design and Conduct is written from the perspective of commissioning agencies.[2] While it references the need for engagement and partnership, it is directed at government agencies and doesn't sufficiently explore the roles of all stakeholders. Without this further elaboration, planning may not sufficiently ensure shared decision making and may underestimate the level of effort of all stakeholders in an evaluation.

VACCA recommends

- *That there is further elaboration of the role of different stakeholders throughout the IES Draft and the Guide so that planning better reflects the totality of effort required for evaluations and meaningfully reflects the different roles of all stakeholders in an evaluation*

Principles-based approach to evaluation

VACCA welcomes the articulation of five principles underpinning the IES Draft and what they mean in practice. The draft strategy marks a significant shift for government agencies aimed at improving practice, including how Aboriginal and Torres Strait people, communities and organisations are impacted by evaluation. However, VACCA notes that there is no reference to human rights principles in either the IES Draft or the IES Guide.[3] Principles which VACCA considers critical to supporting better outcomes and building a learning culture, are missing. The objective of the IES Draft is to improve the lives for Aboriginal and Torres Strait Islander people.[4] Self-determination is critical to this, as is a transformative evaluation approach, or one explicitly valuing social justice for Aboriginal and Torres Strait Islander people. Other principles such as building capacity are also critical to better outcomes and building a learning culture.

VACCA recommends

- *That the principle of self-determination for Aboriginal and Torres Strait Islander people, Communities and organisations be included as a principle underpinning the strategy and guide.*
- *That the principles of social justice and building capacity be included in the strategy to support the building of a learning culture.*

Meaningful shared decision making

VACCA's 2019 submission to the Productivity Commission's Inquiry into Indigenous Evaluation Strategy stressed the importance of Aboriginal and Torres Strait Islander leadership in evaluations. This notion aligns with the Partnership Agreement on Closing the Gap which '*embodies the belief in all its signatories that shared decision making with Aboriginal and Torres Strait Islander community controlled representatives in the design,*

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[1] IES Draft, p.6-7
[2] IES Draft Guide, p.14
[3] The background paper references the United Nations Declaration on the Rights of Indigenous People. Indigenous Evaluation Strategy; Draft Background Paper, p.68
[4] IES Draft, p.7

implementation and monitoring of the Closing the Gap framework is essential to achieve their shared goal to close the gap in life outcomes between Indigenous and non-Indigenous Australians'.[5]

VACCA welcomes the overarching principle of the IES Draft of centring Aboriginal and Torres Strait Islander people and the way that engagement and partnership are encouraged in the policy and draft. However, the draft does not demonstrate how this will result in Aboriginal leadership of evaluation. For example, Table 1[6] describes how Aboriginal and Torres Strait Islander people will be engaged in determining what to evaluate, have the option of partnering in planning, design and conduct, engaged in planning, design and conduct, engaged in translating findings – but it's not clear that it would result in meaningful partnerships in evaluation governance. While the articulation of a four-stage maturity approach to evaluation is a useful one, leadership by Aboriginal and Torres Strait Islander people in evaluation and implementation is only included in the final stage when it should be embedded in earlier stages.[7] Greater clarity and some additional emphasis on leadership will ensure that the draft supports a shift from Aboriginal and Torres Strait Islander people, Communities and organisations having evaluation *done to* them to being *done with* them through genuine partnerships.

Related to this, the IES Draft and the IES Guide Draft refer frequently to *Aboriginal and Torres Strait Islander people.* Shared decision making of evaluations would be enhanced by adding specific references to communities, community representatives and organisations, including ACCOs, when relevant. For example, in elaborating the principle of centring Aboriginal and Torres Strait Islander people[8] it is stated that '*Aboriginal and Torres Strait Islander people have the option of being partners in all stages of evaluation. This includes engaging with Aboriginal and Torres Strait Islander people on evaluation questions, evaluation approaches and methods...*'.

VACCA recommends:

- *That the strategy and guide recognise and ensure self- determination in evaluation, and that this should be driven from the governance level with Aboriginal and Torres Strait Islander communities, agencies and people as part of evaluation governance arrangements.*
- *That references to Aboriginal and Torres Strait Islander people be reviewed to ensure that, where relevant, communities, community representatives and organisations are also referenced.*
- *That the four-stage maturity approach to evaluation embeds leadership by Aboriginal and Torres Strait Islander people in evaluation and implementation in earlier stages and not just the final stage.*

Ethical evaluations

VACCA appreciates the importance of stressing the need for ethical design and implementation even where HREC approval is not required. In relation to evaluations requiring HREC approval, VACCA urges that approval should be by an HREC with an Aboriginal and Torres Strait Islander researcher member – rather than an HREC with 'expertise in research with Aboriginal and Torres Strait Islander people'.[9] While not all HRECs currently include such members, VACCA holds the view that the onus is on HRECs to address this, or at a minimum, undertake review and consultation with an Aboriginal or Torres Strait Islander researcher as appropriate.

VACCA recommends:

- *That the strategy requires that any HREC review of an evaluation involving Aboriginal or Torres Strait islander stakeholders include an Aboriginal and/or Torres Strait Islander researcher.*

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[5] As quoted in the IES Draft, p.4
[6] IES Draft, p11
[7] IES Draft, p.20
[8] IES Draft, p.11
[9] IES Draft, p17

Indigenous knowledge

The strategy and guide lack a definition of indigenous knowledge. Without this, it might be possible that valid evidence could be discounted, if it was not considered to be indigenous knowledge. Additionally, if evaluators need to consider the question of what Indigenous knowledge is and what it looks like, then they might have a greater appreciation for the need for Indigenous specific methods used to gather this evidence.

VACCA recommends:

- *That the strategy elaborates on what is Indigenous knowledge.*

Building evaluation into policy and program design

VACCA welcomes the recognition of the need to build evaluation into policy and program design. It is important to emphasize meaningful engagement of service providers in this process to ensure that what frames evaluation is relevant. Development of outcomes should be Aboriginal led. Where possible there should be alignment across jurisdictions with outcome frameworks at a population level. Where service delivery organisations are expected to contribute to these outcomes there needs to be recognition of and flexibility to support self-determination at the local level as to how outcomes are enacted. This is also necessary as the outcomes that apply at a population level are not necessarily those that apply at a program level. VACCA, program logics are developed in a participatory way with program staff to draw out the knowledge and experience of staff about who the program is supporting, how and the intended outcomes. Program logics developed by funding agencies often reflect the outcomes being sought by funding agencies – which might relate to broad policy reforms rather than specific intended outcomes for service users. They might also not include cultural outcomes that matter to service users and service providers in achieving change.

VACCA welcomes the requirement of the draft strategy that agencies develop forward evaluation plans, as this may assist service providers. In planning for evaluations, however, it is important to ensure there is cross-agency coordination and recognition of state funding evaluation obligations on service providers, to reduce the potential load of multiple, simultaneous evaluations. This is particularly desirable for smaller organisations with limited evaluation capability.

VACCA recommends:

- *That Aboriginal and Torres Strait Islander people, communities and organisations share decision making regarding the program and evaluation design, including program logics.*
- *That forward planning be coordinated across agencies and with service providers to minimise risks of organisations being externally evaluated for multiple programs/projects simultaneously.*

Diversity of perspectives and knowledge

The IES draft and guide are aimed at Australian Government agencies which may be supporting implementation of programs across different states. In planning for evaluation, it is critical that ways of working with Aboriginal people, communities and organisations recognise the diversity of perspectives and experiences in the different contexts. An urban Aboriginal community in Melbourne will have different needs, perspectives and experiences to a remote Aboriginal community in the Northern Territory.

VACCA recommends:

- *Ensuring that evaluations of policies and programs which are implemented in multiple sites engaging people, communities and organisations in the different sites, ensure that program design and evaluation are tailored to the local context.*

Data sovereignty

While there is reference in the draft strategy to developing protocols around data and the need for partnerships with Aboriginal and Torres Strait Islander people in the governance, development, collection, use and

management of data, there is no reference to data sovereignty in the draft strategy or guide.[10] Actions 5 requires further elaboration regarding what is meant by the action and how it supports data sovereignty.[11] Action 6 is unclear in that the heading does not appear to reflect the content. [12]

VACCA recommends:

- *That the draft strategy supports data sovereignty by ensuring that Aboriginal and Torres Strait Islander people, community representatives and organisations are involved in the governance of evaluations to ensure shared decisions regarding what data is collected, in what ways, how it is stored and its applications.*
- *That Action 5 in the draft strategy be further elaborated regarding what is meant and how it supports data sovereignty.[13]*
- *That Action 6 is reviewed to ensure that the content is consistent with the heading. [14]*

Resourcing

VACCA welcomes reference to the need for resourcing to support evaluation and for resourcing to be factored into planning and program design. Further clarification of this is required to ensure that resourcing is enough to enable service providers to comply with evaluation data collection requirements. For example, there is reference to the need for evaluation planning during design and for adequate resourcing and realistic timeframes, but this remains unclear unless it is explained further.[15] What this looks like in practice for all stakeholders in the process is important to ensure that government agencies understand how they need to be designing budgets, work plans and schedules with service providers to support evaluation. For example, funding agreements for the delivery of services should cover staffing and other costs associated with collecting administrative, monitoring and evaluation data (if relevant), and engagement in external evaluations.

VACCA recommends

- *That reference to resourcing be elaborated to spell out that government agencies need to adequately fund service providers and community organisations and representatives for their engagement in monitoring and evaluation activities.*

Capacity building

Both the draft and the guide cover important points in relation to evaluation capacity building, including of Aboriginal and Torres Strait Islander public servants. The strategy provides an important opportunity to support evaluation capacity building in service provider organisations which are at the frontline of implementation of policies and programs for Aboriginal and Torres Strait Islander people. There is no reference, however, to the need for capacity building for non-government agencies involved in service delivery, where the bulk of evaluation data collection resides. The overall focus of the strategy is on externally driven evaluations – rather than a mixed approach which includes participatory and empowering evaluation designed to build the capacity of service providers to improve internal monitoring systems and engage with external evaluations.

VACCA recommends

- *That the strategy recognises the value of a mixed approach to evaluations*
- *That the strategy recognises the importance of building evaluation capability in organisations partnering with government to implement policies and deliver services.*

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[10] IES Draft, p.27
[11] IES Draft, p. 27
[12] IES Draft, p.27
[13] IES Draft, p. 27
[14] IES Draft, p.27
[15] the Draft IES Guide on p. 6

- *That further guidance is provided to funding agencies about how to support evaluation capacity building in service provider and other organisations.*

Governance arrangements - Office of Indigenous Policy Evaluation

VACCA notes the recommendation for the creation of an Office of Indigenous Policy Evaluation (OIPE) and an Indigenous Evaluation Council to provide strategic guidance to the OIPE. It is critical to ensure that the creation of the new mechanisms does not detract from meaning partnerships in the governance of specific evaluation projects and from efforts to build evaluation capacity at the front line – for service providers, and Community representatives.

VACCA recommends:

- *That the strategy provides further clarity regarding how shared decision making with Community organisations and service providers for specific evaluations will be ensured*
- *That the strategy includes provisions for evaluation capacity building for Community organisations and service providers partnering with the Australian Government on implementation of policies and programs for Aboriginal and Torres Strait Islander people.*