



COMMUNITY FIRST
DEVELOPMENT

FORMERLY
**Indigenous
community**
volunteers

SUBMISSION ON THE DRAFT INDIGENOUS EVALUATION STRATEGY

AUGUST 2020

FIRST NATIONS PEOPLE HAVE GLOBAL SOLUTIONS AND INNOVATIONS THAT ADDRESS MANY OF HUMANITY'S GREATEST CHALLENGES, INCLUDING CARING FOR THE ENVIRONMENT.

OUR VISION

First Nations peoples and communities are thriving.

WHO WE ARE

Community First Development is a First Nations community development and research organisation that creates positive change in and with First Nations communities.

WHAT WE DO

We undertake social and economic development, and research projects in partnership with First Nations communities, businesses and people. Communities have control; they name the priorities and choose the design, assets, capabilities and approaches to achieve their vision. We provide tailored support through community partners, skilled staff, trained volunteers, key supporters and service providers.





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OVERVIEW

Community First Development is a First Nations community development and research organisation. We promote the skills, talents and cultural strength of our people, and facilitate activities where they lead positive changes for their communities. We recognise our responsibility to contribute to a more just and equitable world for Aboriginal and Torres Strait Islander people.

Over the past six years, we have 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 (see Figure 1 below).

Our 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.

We welcome the opportunity to provide a submission on the draft Indigenous Evaluation Strategy. This process provides a pivotal opportunity to improve the outcome of Australian Government policies, programs and services that impact First Nations people.

We believe the draft Strategy has several strengths including outlining specific actions for agencies to implement; a strong focus on improving the transparency of evaluations and enhancing their use; and acknowledgment of the need for evaluation to be embedded in the policy and program design and delivery cycles.

While we broadly support the draft Strategy's overarching principle (centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges) and other guiding principles (credible, useful, ethical and transparent), we would like to reiterate that evaluation in First Nations contexts must be consistent with the Australian Government's endorsement of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), First Nations peoples' right to self-determination, and the four Priority Reforms outlined in the new National Agreement on Closing the Gap:

- Formal partnerships and shared decision making;
- Building the community-controlled sector;
- Transforming government organisations; and
- Shared access to data and information at a regional level.

There are two areas of concern about the draft Strategy that we raise in our submission, specifically the absence of actions focused on building the evaluation capabilities of First Nations service providers and grant recipients, and the purpose and functions of the proposed Indigenous Evaluation Council. This combined with responses to specific 'information requests' outlined in the Draft Background Paper, form the basis of our submission.

We hope that the Productivity Commission will use the impetus of the Indigenous Evaluation Strategy to bring genuine reform to policies and programs impacting on First Nations people; and take every opportunity to build First Nations leadership and decision making control into the strategy.

We would be happy to talk with you further about anything outlined in our submission.

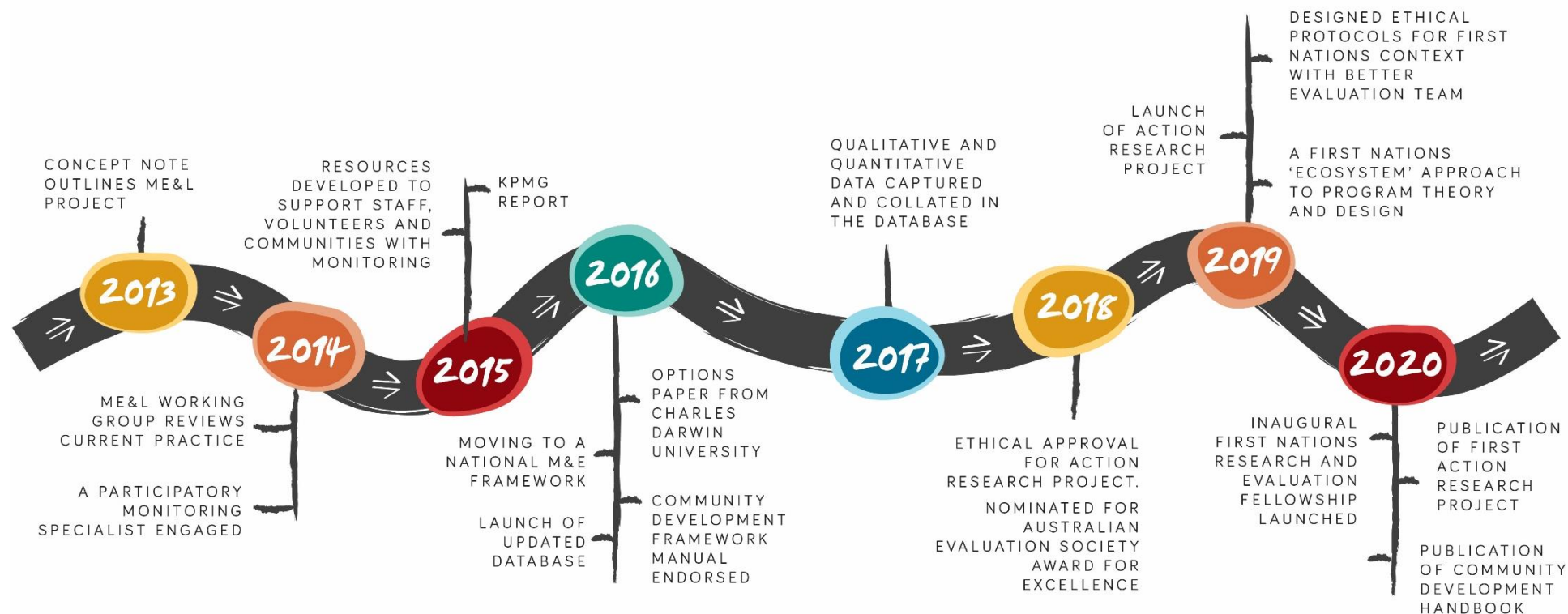


FIGURE 1: COMMUNITY FIRST DEVELOPMENT MONITORING, EVALUATION AND LEARNING TIMELINE.

SUBMISSION STRUCTURE

This Submission consists of two key sections.

- The first section provides responses to select 'information requests' outlined in the Draft Background Paper.
- The second section provides comment and recommendations on other areas of the draft Indigenous Evaluation Strategy.

RECOMMENDATIONS

Our responses to the specific 'information requests' should be interpreted as recommendations. Other recommendations:

Recommendation 1:

That at least one specific action is incorporated into the Final Indigenous Evaluation Strategy requiring agencies to work with First Nations service providers and grant recipients to build their evaluation capabilities and set them up for evaluation success.

Recommendation 2:

That the Indigenous Evaluation Council be given greater powers to jointly oversee implementation of the Strategy with the Office of Indigenous Policy Evaluation.

Recommendation 3:

Amend Action 11 to specify that Agencies' performance against the Strategy should be monitored jointly by the Office of Indigenous Policy Evaluation and the Indigenous Evaluation Council.

1. RESPONSE TO SELECT INFORMATION REQUESTS

In this section we provide responses to select information requests outlined in the Draft Background Paper.

INFORMATION REQUEST 5.1

The Commission is seeking information on effective engagement strategies for evaluation. What engagement models are most effective? For what types of evaluations is co-design most useful? Why?

While definitions of co-design vary, Blomkamp (2018) describes it as a “methodology for innovation...[that] is about generating and testing new solutions to public problems, not merely offering creative approaches to consultation or ‘co-production’ at the stage of delivery”.¹ Co-design is underpinned by the principles of participatory design.² When applied to policy, this means “enabling or empowering the people affected by a policy issue to actively contribute to developing a solution for it”.³ When applied to policy and program design and evaluation itself, this means the Australian Government and public servants recognise the expertise of First Nations people, relinquish some of the control they have over policy and program design as well as evaluations, and allow First Nations people to steer and drive development.

At Community First Development, making sure we deliver on what communities are asking of us is a top priority. The purpose of our monitoring and evaluation is to improve our practice to achieve better outcomes for the communities we work with; and be transparent and accountable to communities and funders.

We co-design, monitor and evaluate all projects with communities using a participatory approach. As per Figure 2 below, communities tell us what success looks like in the short term (projects), and the long term (dream). We then work closely with communities to track progress towards these goals.

¹ Blomkamp, E. (2018), The Promise of Co-Design for Public Policy. Australian Journal of Public Administration, 77: 729-743. doi:[10.1111/1467-8500.12310](https://doi.org/10.1111/1467-8500.12310) p732.

² Blomkamp, E. (2018), The Promise of Co-Design for Public Policy. Australian Journal of Public Administration, 77: 729-743. doi:[10.1111/1467-8500.12310](https://doi.org/10.1111/1467-8500.12310), p729-743.

³ Blomkamp, E. (2018), The Promise of Co-Design for Public Policy. Australian Journal of Public Administration, 77: 729-743. doi:[10.1111/1467-8500.12310](https://doi.org/10.1111/1467-8500.12310) p732.

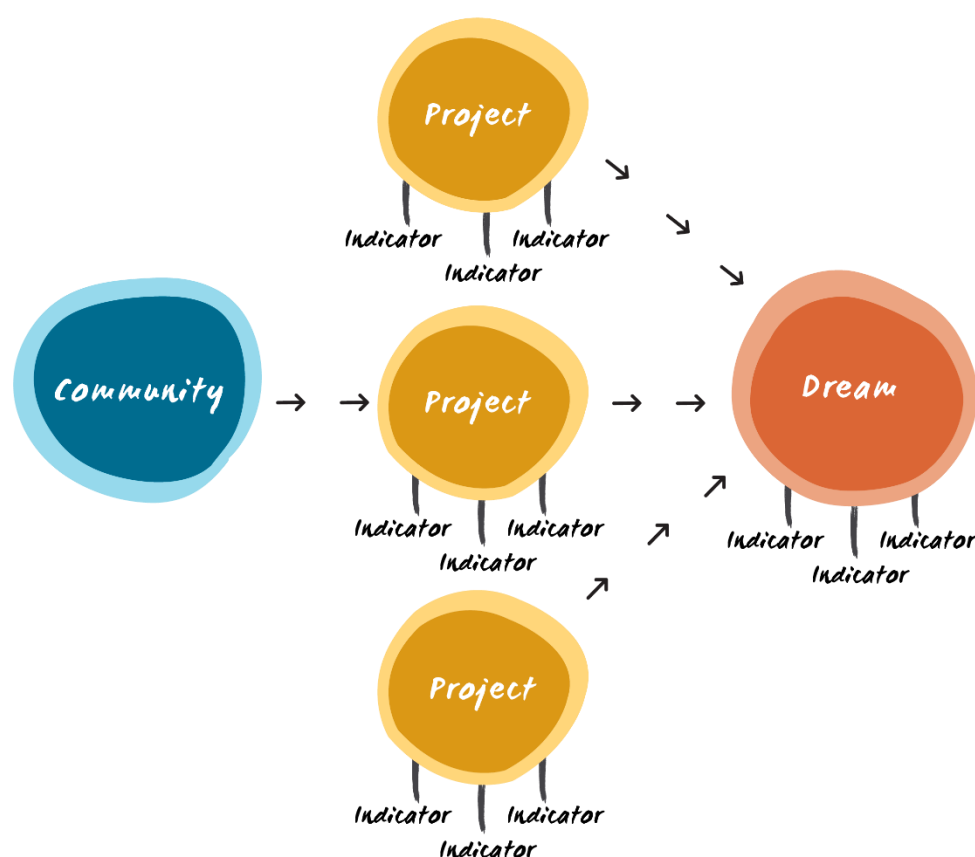


FIGURE 2: COMMUNITY FIRST DEVELOPMENT MONITORING AND EVALUATION FRAMEWORK.

We use 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 our 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. We are 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 provide a more objective assessment of our involvement and how the program can be improved.

You can read more about our participatory approach in action here:

- Evaluating with Littlewell Working Group:
<https://www.communityfirstdevelopment.org.au/stories/evaluating-with-littlewell-working-group>
- Evaluating with Kungkas Can Cook: Passion, Dedication and Clear Social Purpose:
<https://www.communityfirstdevelopment.org.au/stories/evaluating-with-kungkas-can-cook-passion-dedication-and-clear-social-purpose>

INFORMATION REQUEST 6.1

The Commission proposes that the interim evaluation priorities for the Indigenous Evaluation Strategy be broad and based on the Council of Australian Governments and the Joint Council on Closing the Gap draft policy priorities. Is this appropriate?

If so, are there any priority areas missing from those currently identified through the Council of Australian Governments and the Joint Council on Closing the Gap?

If not, what specific policy or program areas should be the focus of better quality evaluations?

We agree that it is appropriate for the interim evaluation priorities for the Indigenous Evaluation Strategy to be broad and based on the National Federation Reform Council's new National Agreement on Closing the Gap.

In terms of immediate priorities for evaluation, we recommend the focus should be on policies and programs perceived by First Nations people as being the most harmful and contrary to their right to self-determination.

INFORMATION REQUEST 7.1

The Commission is seeking participants' views on which current Australian Government agency would be best placed to house the Indigenous Evaluation Clearinghouse: the Australian Institute of Health and Welfare; the Australian Institute of Family Studies; the Australian Institute of Aboriginal and Torres Strait Islander Studies; the Productivity Commission; or some other agency?

In line with the draft Strategy's overarching principle, 'centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges', other key principles, and recognition of the need for First Nations governance for the Strategy, we recommend that the proposed Indigenous Evaluation Clearinghouse be housed by a strongly-governed First Nations organisation. Such an approach aligns with and will enhance 'data sovereignty', an important and increasingly referred to concept about the right of First Nations people to exercise ownership of their data⁴. It also aligns with the new National Agreement on Closing the Gap's outcomes, particularly building the community-controlled sector and Aboriginal and Torres Strait Islander-led data.

A First Nations organisation is better placed to understand the cultural requirements for this important role, and ensure data is shared in a way that is relevant for First Nations people. The First Nations organisation should be adequately funded to communicate findings.

Further, resourcing a First Nations organisation to manage the Clearinghouse outside of the Australian Government, will create economic development opportunities for First Nations people.

⁴ Maïam nayri Wingara Aboriginal and Torres Strait Islander Data Sovereignty Collective. (n.d.). 'Key Principles'. Retrieved from <https://www.maïamnayriwingara.org/key-principles>

We recommend that the Australian Government make a long-term commitment to fund the Clearinghouse. The draft Background Paper mentions the Closing the Gap Clearinghouse that was funded for five years between 2009 to 2014. Given the long-term commitment required for the Closing the Gap targets, a sustained long-term effort is required for the evaluation to support the strategy and policies and programs impacting First Nations people.

INFORMATION REQUEST 7.3

The Commission is seeking participants' views on how members of an Indigenous Evaluation Council might be appointed. For example, could members be nominated by the Aboriginal and Torres Strait Islander community controlled sector; for their experience in research, monitoring and evaluation; or based on some other factors? Would the host agency for the Office of Indigenous Policy Evaluation, and/or the Australian Government, need to be members?

Our recommendations below consider the proposed function of the Indigenous Evaluation Council 'to provide strategic guidance to the OIPE'. We provide further comment on the proposed purpose and functions of the Council in section 2: Other comments on the draft strategy.

If the Australian Government is genuinely committed to the overarching principle of the draft Strategy – centring Aboriginal and Torres Strait Islander people, perspectives priorities and knowledges – then all Indigenous Evaluation Council members should be First Nations people and independent of government. From our perspective, there is little benefit in the host agency of the Office of Indigenous Policy Evaluation (OIPE), and/or the Australian Government, being members of the Council. Doing so will dilute the independence and voice of the Council. As Dr Lorraine Muller, a Murri woman and Adjunct Senior Research Fellow at James Cook University and Adjunct Research Fellow at the University of Queensland, outlines in an open letter on Ethics Committees, “Government policies, programs and non-Indigenous interests are not necessarily considered by Indigenous Australians to be in their best interests and benefit”⁵. However, the Council’s Terms of Reference and powers should be defined to ensure the Council engages in co-design processes with the OIPE and relevant Ministers as required. The OIPE should provide Secretariat support for the Council.

We recommend that the Council consists of First Nations people from the research, evaluation, and service delivery sectors. It is important that practitioners and organisations working at the grassroots, community level, are represented on the Council. Council members should be appointed for their specific expertise, as well as their access to, and ability to engage with, First Nations people and communities at a grassroots level.

⁵ @IndigenousX. (2020). Dr Muller: Open letter on Ethics Committees. Retrieved from <https://indigenoux.com.au/dr-muller-open-letter-on-ethics-committees/>

2. OTHER COMMENTS ON THE DRAFT STRATEGY

In this section we comment and provide recommendations on specific areas within the draft Strategy.

BUILDING CAPACITY TO CONDUCT AND MANAGE HIGH QUALITY EVALUATIONS

Table 1: Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges in practice, states that ‘evaluation processes seek to build capability among Aboriginal and Torres Strait Islander evaluators, organisations and communities’. However, the four actions in the Draft strategy that relate to ‘building capability to conduct and manage high quality evaluations’ (Actions 3-6) focus on building the capability of agency staff only. This is a significant oversight.

While there is an obvious need to build the evaluation capability of agency staff, it is equally important to implement mechanisms to build the evaluation capability of First Nations service providers and grant recipients. Evaluating policies and programs relating to Aboriginal and Torres Strait Islander people will require data from service providers and grant recipients. Service providers and grant recipients already comply with reporting obligations, which from our experience and that of the communities we work with, can at times be complex and onerous. With the enhanced focus on building evaluation into the policy and program design and delivery cycles, we anticipate that monitoring, evaluation and reporting expectations for service providers and grant recipients, will increase. Increased expectations but no capacity building support does not set First Nations service providers and grant recipients up for a win.

Solution

We recommend that at least one specific action is incorporated into the final Strategy requiring agencies to work with First Nations service providers and grant recipients to build their evaluation capabilities. This should not be an afterthought. Agencies must consider this requirement and undertake specific action where needed, during all stages of the policy and program design and delivery cycles.

Such capacity building support must be aimed at setting First Nations service providers and grant recipients up for evaluation success. This support should be well planned, delivered in a culturally safe manner, and tailored to the specific audience. Service providers and grant recipients should be able to access this support in multiple ways and on an ongoing basis.

Importantly, agencies should work with service 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 1: That at least one specific action is incorporated into the Final Indigenous Evaluation Strategy requiring agencies to work with First Nations service providers and grant recipients to build their evaluation capabilities and set them up for evaluation success.

PURPOSE AND FUNCTIONS OF THE INDIGENOUS EVALUATION COUNCIL

As outlined in the draft Strategy, the main function of the proposed Indigenous Evaluation Council is to 'provide strategic guidance to the OIPE' on a number of things including the translation, dissemination and synthesis of evaluation findings; and engaging with Aboriginal and Torres Strait Islander people, communities and organisations to facilitate their input. It is also proposed that the Council works in partnership with the OIPE to recommend an Australian Government-wide set of evaluation priorities and report on the state of Indigenous policy evaluation across the Australian Public Service.

We are pleased to see that the proposed Council will have a consultative/engagement function as we believe the voices of First Nations people, communities and organisations, particularly at the grassroots level, are key to successful implementation of the Strategy. To put it simply, judgements cannot be made about the merit or worth of a policy or program without any input from those people the policy or program is aimed at. However, we are concerned that the proposed Council will become another advisory body with little influence unless some modifications are made to its proposed functions.

Solution

We recommend that the Indigenous Evaluation Council be given greater powers to jointly oversee implementation of the Strategy with the OIPE. Rather than a strategic advisory body *to* the OIPE, the Council should be considered as an equal partner *with* the OIPE. We believe this is more in line with the overarching principle of the draft Strategy, centring Aboriginal and Torres Strait Islander people, perspectives priorities and knowledges.

One way this could be done is by the Council collaboratively working with the OIPE to make decisions relating to:

- evaluation planning, commissioning, conduct, publication and use, capability-building and cultural safety
- the translation, dissemination and synthesis of evaluation findings
- agencies' compliance with the Strategy; and
- monitoring of the Strategy.

The Council should also take a partnership role with the OIPE in monitoring Agencies' performance against the Strategy (Action 11).

Such an approach would draw on the strengths of both partners and facilitate a stronger two-way information exchange. For example, the approach would combine OIPE's understandings of how agencies work, Australian Public Service policies and procedures; and the Council's collective expertise, cultural knowledge, lived experiences and connections with Aboriginal and Torres Strait Islander people and communities at the grassroots level. More importantly, a partnership approach will support the building of trust.

Recommendation 2: That the Indigenous Evaluation Council be given greater powers to jointly oversee implementation of the Strategy with the Office of Indigenous Policy Evaluation.

Recommendation 3: Amend Action 11 to specify that Agencies' performance against the Strategy should be monitored jointly by the Office of Indigenous Policy Evaluation and the Indigenous Evaluation Council.

3. CONCLUSION

After years of failed policies and programs impacting First Nations people, harm done and misdirected and wasted government funds, taking an equal partnership approach to policy and program design and evaluation is well over-due.

We are encouraged that government is exploring models to better facilitate a partnership approach to governance as evidenced by the approach taken to design the new Closing the Gap targets.

The draft Indigenous Evaluation Strategy sets out some important actions towards achieving a partnership approach, but it can go further. History shows myriad of governance arrangements whereby First Nations people have been given tokenistic advisory roles, or “consulted” on government policies and programs. These can be damaging processes followed by inaction, where those consulted are not truly heard.

Without equal partnership and decision-making powers provided to First Nations people and, in particular, the Indigenous Evaluation Council, the intent of the strategy may not be realised.

We thank the Productivity Commission for a well-considered strategy, and encourage it to take further advantage of this unique opportunity to build First Nations leadership and decision-making into government’s policy and program cycles.