

## **To The Productivity Commission Inquiry into developing an Indigenous Evaluation Strategy .**

**Key project dates** 10 April 2019

Project commencement

Due date for submissions 23 August 2019

The value of evaluation is in its effects

Submission based on my attachment to UTS: Jumbunna Institute for Indigenous Education and Research which aims to produce the highest quality research on Indigenous legal and policy issues and to develop highly skilled Indigenous researchers

Issues to be addressed partially below

- What are the current arrangements and requirements (if any) for publishing Australian Government evaluation reports? How are agencies held accountable for responding to evaluation recommendations or findings?
- Should all evaluation reports be published? In what circumstances might it be appropriate to not publish evaluation reports?
- To what extent are current data governance arrangements effective? What can be done to improve arrangements?

The following submission is targeting the need for publication criteria to ensure the effective use of evaluation processes both for the Aboriginal and Torres Strait communities affected and the wider range of communities. The current record of attention to the reports suggest that post completion access to reports are often very limited, and often ignored. As a starting point to better

use and availability of evaluation data, the groups affected and others public and media attention are necessary to create responses. These can improve discussion and action that can make major contributions to legitimating the evaluation processes and improving the official decisions as the data and analysis offered gets wider scrutiny. There are far too many examples of recent evaluations that have neither been made broadly available and discussed, nor have been effectively used in improving, extending or terminating programs involved.

This is often a problem more generally, as governments often fail to use their own research or allow others access to the data to improve decisions on policy or funding. However, evaluations are formal and therefore particularly important. When the program policy target groups are already in a limited power position, they are often lacking the networks and authority that assist groups to be heard in political decisions making.

The existence and failed efforts of most of the Closing the Gap targets show the need for optimum use and discussion of useful data, particularly where these evaluate any programs directed at them. This has dismally failed in the past. Efforts by the AIHW a decade ago to use its role as collector of data to produce criteria of what works, failed to influence policy making. As part of their brief role as the Closing the Gap Clearinghouse, they produced a range of publications that offered evaluative research findings, of what works, including a summary paper in 2015, the findings of which appears to have been ignored by the governments since the Clearing House was defunded. <https://www.aihw.gov.au/getmedia/4f8276f5-e467-442e-a9ef-80b8c010c690/ctgc-ip13.pdf.aspx?inline=true>

Therefore this submission targets the need for post completion processes that ensure that groups affected do get adequate access to any evaluations and assistance to respond effectively to its findings. The evidence shows that evaluations', both good and bad, have not been used effectively to consider the value of programs or the design of newer versions and funding

processes. The post evaluation processes are of particular importance in areas that affect Indigenous populations and locations.

Further evidence of a very neglected area

The examples above are drawn from both the evaluations of two related programs: Income Management in the NT and the newer Cashless Debit Card programs in SA and WA. In both cases the evaluations have offered problematic data on their effectiveness and yet the programs both continue and the government is likely to expand the model. despite the limits of the evaluations and the lack of good evidence. Crucial to the critique is the fact that even when there have been useful findings, these have NOT been used to fix the issues raised. While the questions asked by the Inquiry cover important issues of design and the very needed participation of communities in design and delivery , the problem of distribution and discussion of the reports are not adequately addressed

The background paper offered by the PC is very thorough in its coverage of options for the development of the Strategy and no doubt the submissions will cover the process flaws in current models. However, what appears to be missing is an analysis of the widespread failure of Governments to use the existing data, flawed as it maybe both procedurally and structurally, which shows how limited the existing programs are. The following submission offers examples of evaluations of forms of income management that have been ignored or misused over the last decade by governments, resulting in retention and expansion of programs that have been evaluated as inadequate or even problematic.

Therefore the following submission offers further evidence of the failure of evaluations to influence policy making and suggests the need for including in the models adopted, not only the Participation (inclusive) joint control model processes for evaluations abut also criteria for the

wide distribution, and discussion of the reported outcomes. This must include those likely to be affected by the outcomes and those with appropriate expertise to ensure that data and reports are not suppressed, ignored or misused

## **THE ISSUES THAT EMERGE**

The danger that is increasingly obvious is that evaluation of programs/policies has become an essential part of almost all proposals for new policies in the social policy areas. However, the adding of this item as a KPI, to be subcontracted and reported on, does not, in too many cases, become part of decision making on the future of the programs/policies. I have seen this particularly in the areas that mostly affect Indigenous policies and programs. Since 2009, I have been attached to Jumbunna's Research area at UTS.

My role, currently as an Adjunct Professor, has been working on the policies and evaluations of Income Management and the Cashless Debit Card. My first publication on this area was in 2011 via issue, No 12, of the Journal of Indigenous Policy, titled 'Evidence Free Policy Making? The case of Income Management'. This edition explored the lack of attention to, and poor use of, the range of data and evaluations in decisions for the continuation of the policy.

I have since looked at the evaluation of the Cashless Debit Card, some of which has been published in the Guardian, **'Much of the data used to justify the welfare card is flawed'** **September 7, 2017**

<https://www.theguardian.com/commentisfree/2017/sep/07/much-of-the-data-used-to-justify-the-welfare-card-is-flawed>

My access to the Guardian meant that my critique was quite widely accessed and quoted. However, this did not affect the government claims that the flawed data was sound and they have both the power and resources to reject and ignore critiques.

However the report from the National Audit Office did attract some official responses to its critique:

#### **ANAO Conclusion in July 2017**

<https://www.austaxpolicy.com/news/anao-report-implementation-performance-cashless-debit-card-trial/>

The Department of Social Services largely established appropriate arrangements to implement the Cashless Debit Card Trial, however, its approach to monitoring and evaluation was inadequate. As a consequence, it is difficult to conclude whether there had been a reduction in social harm and whether the card was a lower cost welfare quarantining approach.

These two examples show clearly the failure of the use of available data /evaluations, as both forms of income management continue and expansion is threatened. My concern about the use of evaluations is that the we can fix the design aspects of the evaluations, by addressing the flawed designs and data collection models, as indicated by the questions raised by the inquiry. However, if there are no systemic inbuilt criteria about the distribution and access to the data, and some resources included to allow both feedback from and follow up action by both the groups affected by the programs evaluated , the evaluations can be just another KPI completed.

A clearer example is the earlier evaluation failure report on the long established Income management trial example . This was not just the individual effort but very legitimate outcomes of no real changes affected are also ignored. The expensive and extensive evaluation by a consortium headed by UNSW. were selected by the government to evaluate the Income Management program and presented their final report in 2014, It is a big report (Evaluating New Income Management, in the Northern Territory: Final Evaluation Report, September 2014, J Rob

Bray, Matthew Gray, Kelly Hand and Ilan Katz) The results of the experiment per se were not easy to find in the summary as much procedural issues were also evaluated.

The following quotes from the Summary indicate the problems that were ignored.

*'The evaluation could not find any substantive evidence of the program having significant changes relative to its key policy objectives, including changing people's behaviours.*

— *There was no evidence of changes in spending patterns, including food and alcohol sales, other than a slight possible improvement in the incidence of running out of money for food by those on Voluntary Income Management, but no change for those on compulsory income management. The data show that spending on BasicsCard on fruit and vegetables is very low.*

— *There was no evidence of any overall improvement in financial wellbeing, including reductions in financial harassment or improved financial management skills. There are very high rates of replacement of BasicsCards, and there has been little abatement in the rate at which BasicsCard transactions fail due to inadequate funds. There is no evidence of marked change in the extent to which people have low balances in their BasicsCard and income management accounts. While some groups reported a relative decrease in problems because they had given money to others, they however also reported – again relative to the control group – an increase in the extent to which they asked others for money to purchase essentials. There was no decrease in reported harassment at the community level.*

— *More general measures of wellbeing at the community level show no evidence of improvement, including for children. Data was collected on the incidence of problems in families due to alcohol, drugs and gambling. This was analysed as to whether there were any problems, and whether there were severe problems. All the groups reported a relative reduction in the incidence of there being any problems, but no change or an increase in severe problems. Only those on Voluntary Income Management reported a relative reduction in alcohol problems in their family, but, along with others, no improvement in problems with drinking in their community.*

## *Conclusion*

*The evaluation data does not provide evidence of income management having improved the outcomes that it was intending to have an impact upon. Indeed, rather than promoting independence and the building of skills and capabilities, New Income Management in the Northern Territory appears to have encouraged increasing dependence upon the welfare system, and the tools which were envisaged as providing them with the skills to manage have rather become instruments which relieve them of the burden of management. While at one level, and for some groups, this may still be seen as a positive outcome and one which they report as having improved their quality of life – and it is possible that some may be able to lift themselves out of their situation – more broadly it also comes at a cost of greater dependence. This, though, is not the whole story of income management – many people report having been largely untouched by the measure since they are already managing effectively; others report that the program has been a major inconvenience, making life more difficult without changing outcomes and, as noted previously, many who report a sense of unfairness.*

[https://www.sprc.unsw.edu.au/media/SPRCFile/Evaluation\\_of\\_New\\_Income\\_Management\\_in\\_the\\_Northern\\_Territory\\_full\\_report.pdf](https://www.sprc.unsw.edu.au/media/SPRCFile/Evaluation_of_New_Income_Management_in_the_Northern_Territory_full_report.pdf)

The above quotes have been included as they show the serious conclusions that created doubts about the effectiveness of the longterm program. This was the government's own evaluation, contracted with a group of academics of high reputation, headed by the UNSW Social Policy Research Centre. Yet, since the report was published in 2014, there has been little government follow up on its data and negative findings. The NT program of Income Management is continuing to be funded, and more concerning is that it has legitimated new programs of an even more conditional control versions, the Cashless Debit Cards above. So the only real discussion of

possible merits and effectiveness have been four new versions and further statements of the government's intentions to expand the mode. While some differences in design have been included, the basic model continues without any acknowledgement of the clear failure to address the flawed results of the first trials, raised in the UNSW reports.

### **The particular need to ensure post evaluation feedback and public attention**

The above two program evaluation examples offer only a limited illustration of the way too many that cover programs targeted to, or including high proportions of first nation groups, can be ignored. The costs of both programs are high, the numbers of people affected over the past decade place are in the ten thousands so they are not minor examples, easily overlooked.

The history of Income Management offers some possible explanation of the failure to address the flaws exposed in the evaluation. The original introduction in 2006/7 was part of The Intervention, the program setup in its final year by the Howard government to deal with 'problems' in NT Indigenous communities. It was established under an exemption to the Racial Discrimination Act to apply to Aboriginal people only. While there were some objections at the time, its focus on these recipients and mutterings of sexual assault and other 'problems', further diminished wider interest to this major change to welfare payments, with racist undertones. . Interestingly, despite the ALP, after gaining power, decided to retain the program, again with little evidence of its effectiveness, but expanded the target groups to all on certain payments in the NT , thus removing the racial discrimination. However, the majority of recipients continued to be Indigenous in the NT, so public and official assumptions of its target population continues So we have had a major set of changes to welfare payments was introduced and signs are they may now be extended to more non Indigenous and little attention since has been paid to the programs or their often negative evaluations.



## **Proposed changes to post delivery handling and funding recommended**

The strategy should include the following:

- The evaluation design should include a post delivery funding program that covers the costs of distributing of copies of the report to all groups that are affected by the functions of the program/policy evaluated
- There should be scheduled meetings offered to all relevant groups to discuss the findings
- There should be media releases to relevant publications that cover the findings
- There should be staff and time allocated to seeking feedback from the groups involved
- There should be a follow up report from the government funding agency, summarizing feedback and responses from the agencies involved in delivering the program.
- There should be a follow up report of responses from the funders to the original findings and their responses and intentions.

These processes should give those potentially affected to lobby for and object to material they feel is inadequate or skewed and limit the power of Government to reject or ignore findings.

Adjunct Professor Eva Cox, AO (16.8.19)

### **AUTHOR'S BACKGROUND**

Eva Cox has had a long interest in evaluation, with a long experience as a researcher, starting with market research in the 1960s, when she set up a consultancy, QED Research and was involved in a range of projects. Her original training was working for Peter Kenny Associates, running surveys and focus groups for advertising agents. In the 1970s she completed honours in

sociology and became active in policy and political issues, in a range of social policy areas. As Director of NCOSS, a welfare peak agency, she undertook a major study of Evaluation, as a 1980 Churchill Fellow, examining this relatively new initiative.. In the eighties she worked in Canberra for a shadow minister on policy development, followed by some years of running her agency, Distaff Associates, which undertook many evaluations of social policies.

She is a very experienced researcher, and also taught research methods, first at UNSW in the 70s and later taught research methods at UTS for a decade plus from 1994 to 2008. She has been involved in and seen the effect of evaluation on policies as both as part of policy development and advocacy, as well as a teacher of methodologies of collecting data. During these experiences, she saw how the politics of policy making and funding of programs seriously affects the effectiveness of the use of evaluative processes. The above is her account of some recent related experiences.