

16 July 2019

Indigenous Evaluation Strategy
Productivity Commission
Locked Bag 2, Collins St East
Melbourne VIC 8003

www.pc.gov.au/Indigenous-Evaluation

Dear Chair,

Subject: Review into the Indigenous Evaluation Strategy

Thank you for this opportunity to make a submission to this Review.

My comments will be brief. I have been adviser and worked as an evaluator, service provider and research for many Aboriginal and Torres Strait Islander (ATSI) projects for over a decade and have an expertise in evaluation, access to justice and research into effective legal and community services.

I am pleased and endorse that the 'overriding objective of the project is to improve outcomes for Aboriginal and Torres Strait Islander people' and 'the need to increase Aboriginal and Torres Strait Islander input into policy processes as a core objective, while another objective might be building the evidence base about 'what works', or ensuring value for money in providing services' (page 2 of your Issues Paper). I will also be clear in that, the *Uluru Statement from the Heart* (NCC 2017) is something that is critical to implement, as a part of the stated core objectives.

My experience is that ATSI peoples (First Nations Peoples) often know what works and why or why not and what the solutions and proactive steps will be for the community, but they are often not asked, listened to or this gets lost in translation and implementation if they are heard at all.

It also is important to note that as with the wider Australian community there is no one Aboriginal view but a diversity of views, perspective and experiences. Pluralism and deliberative democratic processes can assist, and self-determination, as noted in your issues paper is the international benchmark are critical.

Problems

Here are some of my general observations about problems in how evaluation strategies (often of non-engagement) play out currently in some of the evaluation and service review practices in government departments.

1. Taxpayer funding is important but ought not be used as a pretext to exclude the voices of those directly affected by the services. It will never be spent wisely if, those experiencing how the service is delivered and delivering the service are not heard. It is they who have the sense of lived experience of poor health, justice, and social and wellbeing outcomes and how they can impact on their lives and what at a local level can be improved or is working or in the process of being about to work.
2. Personnel administering the evaluation frameworks have little or no training in cultural competency and awareness or in facilitation of community voice.
3. Personnel developing and administering the evaluation frameworks should be trained in providing specific scope and precise briefs to evaluators and should be responsive to the evaluator and ATSI expertise or suggestions or insights from the field work. Recalibration may be needed to make the evaluation appropriate.
4. There may be a formidable Evaluation Strategy of Departments developed, but it is at risk of being thwarted in how it is operationalised and rolled out by government departments.
5. ATSI are rarely, genuinely asked for their valuable input in the co-design of the evaluation framework, the tools or questions and the manner in which the data will be collected in a culturally appropriate and timely way.
6. ATSI agencies are often told who the evaluator will be and there will be little input as to their selection and why.
7. ATSI agencies are often told the evaluator will use an already much rolled out methodology which may or may not be tweaked for the different settings and so it is blunt. It can be a 'tick and flick', 'tick a box' or one that is cheap for the evaluator to roll out repeatedly with minimal reflective practice on its appropriateness to the agency or community setting.
8. Government departments will refuse to take ATSI agency input on a draft report and in fact often refuse to release it to the agency under review for their response.
9. ATSI concerns about either the choice of evaluator, evaluation appropriateness, problems with the evaluator (including actual or perceived bias) or short time frames are ignored often with an excuse that it is taxpayer funding and the department will determine what is appropriate, 'top-down' approaches.
10. Timeframes for evaluations are often tight with the formulation of the process being often done in-house by the department or with the evaluator being commissioned on the basis they will respond to an often poorly defined brief.

11. By the time of roll-out the evaluations time-frames are tight (because it took longer for the department to develop it in house) than the actual conduct of the evaluation in complex communities takes and becomes onerous on the organisations being evaluated which often have more than one set of accountabilities or multiple programmes being evaluated at once. Because funding is reliant on positive evaluation often the evaluator has additional expectations and staff have to be redeployed from the service delivery to support the evaluator.
12. Often the agencies being evaluated have little resources to do the service provision and are expected to drop everything by those conducting or commissioning the evaluations so as to feed into and support the external evaluation with the threats to funding or sustainability underpinning the evaluation.
13. Over-evaluation – many projects have evaluations for projects with small amounts of funding, many services have multiple sources of funding and all require evaluation. These are services that combine to make up essential services to community.
14. Evaluation of projects that are not embedded or that have left little time for the project to establish, rollout, build relationships of trust and gain traction given complexity of client group, remoteness and scope.
15. Evaluations that have unrealistic expectations of numbers of throughput that are not based or shaped and informed by complexity of the client group with often cascading, multiple and complex need and vulnerabilities. (see [Curran, L & Crockett, A 2013, 'Measuring Legal Services: A Practical methodology for measuring the quality and outcomes of legal assistance services', University of Tasmania Law Review, vol. 32, no. 1, pp. 70-95.](#))
16. Evaluations where the qualitative data that explains the reasons for the quantitative data are being stripped or selectively adapted, so the reasons behind the data that are complex, are omitted and enable the quantitative data to be manipulated and unexplained (see [Curran, L 2013, 'Legal Review: Not all in the Statistics', Law Institute Journal, vol. July 2013, pp. 36 - 39.](#))
17. Requests by Departments for independent evaluators to change key findings or change the wording to reflect better on the Ministry which mask complexity or actions needed to support the service delivery that make Ministry look bad.

Suggestions for Improvement

- 1A. The **'Ethical conduct in research with Aboriginal and Torres Strait Islander Peoples and communities: Guidelines for researchers and stakeholders 2018'** and **'Keeping research on track II 2018'** documents ought to guide evaluations. Although from the research realm the safeguards contained in these documents should be applicable or shape evaluation work as well.
- 2A. Guidelines on [Ethical Conduct of Evaluation and Code of Ethics](#) (Revised July 2013) and [Code of Ethics](#) of the Australian Evaluation Society should provide a standard, an ethical framework and benchmark for evaluators undertaking evaluation work. (Disclosure: I am a member of the ASE).

3A. The voices of those directly affected by the services including agencies, service providers and clients/patient/students be included in evaluation processes. Tax payer money will be spent wisely if those experiencing how the service is delivered and delivering the service are heard. It is they who have the sense of lived experience of poor health, justice, and social and wellbeing outcomes and how they can impact on their lives and what at a local level can be improved or is working or in the process of being about to work.

4A. Personnel administering the evaluation frameworks have training in cultural competency and awareness or in facilitation of community voice. They also have training in the ethical frameworks and approaches in 1A and 2A above that should shape and inform the evaluation commissioning and rollout.

5A. Processes are developed and actioned for genuine ATSI input in the co-design of the evaluation framework, the tools or questions and the manner in which the data will be collected in a culturally appropriate and timely way.

6A. If ATSI agencies want input on a draft report and its release, the department should facilitate this in the interests of transparency and within a framework of continuous learning, development, reflection and innovation.

7A. ATSI agencies are consulted on the choice of evaluator, ATSI input or personnel (if possible being included -see 1A) and have input as to their selection and why.

8A. A formal process be enabled to facilitate ATSI agencies in raising any concerns about either the choice of evaluator, evaluation appropriateness, ethical conduct, bias, bullying or harassment or other problems with the evaluator (including actual or perceived bias).

9A. Realistic time frames for the conduct of the evaluation and appropriate lead times for co -design and ATSI input.

10A. Evaluation of projects are embedded where possible to see developments over time for the project to establish, rollout, build relationships of trust and gain traction given complexity of client group, remoteness and scope within a framework of continuous learning, development, reflection and innovation and participation.

11A. Quantitative data and the qualitative data are not separated where reasons behind the data are complex, and if omitted would distort the actual reality and explain the reasons sitting behind the statistical data providing a fuller picture and the actual context or reasons to avert manipulation.

12A. That Government Departments process and conduct of Evaluation and adherence to the strategy be evaluated with input from ATSI advisers, so as to keep them accountable and to be consistent, also in the interests of transparency and within a framework of continuous learning, development, reflection and innovation.

13A. The resources needed to do the service provision be balanced with the commissioning of the evaluations to reduce agencies being stretched that can compromise service provision.

14A. Underpinning departmental practice should be opportunities for departmental staff debriefing opportunities so as to develop staff abilities to engage in reflective practice about what they do that works and why, what they do that does not work and why and what changes in practice and innovation they need to undertake to improve their conduct of departmental evaluations in ATSI community. This is also good practice for any evaluation, not just in the ATSI space, so they are more effective, efficient and responsive.

14A. This article may be of assistance in elaborating on a participatory approach to evaluation and how it can be done: Curran L and Taylor-Barnett P (2019) 'Evaluating projects in multifaceted and marginalised communities: The need for mixed approaches, *Evaluation Journal of Australasia* Volume: 19 Issue: 1, pp: 22-38. <https://journals.sagepub.com/doi/abs/10.1177/1035719X19832688>.

15A. Projects and programs should be evaluated in either an embedded way over time from service start-up to make comparisons and learn or should not be undertaken in realistic time frames for projects to have traction. Funding needs to be more consistent and longer term to avert evaluations being used as a tool to threaten an agency's existence rather than as a process to fund effective projects and learn about what works well and why or why not to have a positive community impact.

I hope these suggestions have some utility for your Review.

Please do not hesitate to contact me should you have any queries or questions,

Yours Faithfully,

[Dr Liz Curran](#)

Associate Professor, ANU School of Legal Practice

Associate Director Centre for the Profession, Education and Regulation on Law (PEARL)

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