

Submission from Yulang Indigenous Evaluation

We are glad to have the opportunity to provide the Productivity Commission with feedback on the *Indigenous Evaluation Strategy Draft* of May 2020. We acknowledge the extensive background documentation, and that there are still key steps to take to finalise the strategy.

We consider this document to be of tremendous importance. Some of our feedback below is detailed – we are happy to discuss any of our suggestions should that be beneficial.

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On the strategy itself

This part of the submission examines the strategy itself.

We support many features of the strategy, such as:

- its existence
- opportunity for public consultation
- its acknowledgement of the centrality of Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges
- the development of an Office of Indigenous Policy Evaluation
- that the strategy applies to *all* policies and programs that affect Aboriginal and Torres Strait Islander people, not just those which are *specifically for* Aboriginal and Torres Strait Islander people
- the program logic summarised in Figure 1, which is that an Indigenous Evaluation Strategy will lead to better policies and programs, which will lead to better lives for Aboriginal and Torres Strait Islander people.

However we're concerned that the draft strategy lacks clarity. Clarifying the strategy will allow:

- government departments and agencies to act with greater confidence, including training staff
- Aboriginal and Torres Strait Islander people, communities and organisations to act and/or respond with greater confidence
- better accountability against the strategy
- the strategy itself to be evaluated in time.

Careful attention to layout formatting will also improve clarity, as will adding an introduction and breakout box that explains the format of the document and how to read the document i.e. that information is presented in tables – why, and how to best engage with these.

Following is our feedback on elements of the strategy, provided in an effort to help stimulate further clarity.

Objective

It is important that the objective is expressed more clearly and visibly. It must also be phrased the same way at each mention. The objective is described in the text as: 'To improve the lives of Aboriginal and Torres Strait Islander people by having policy and program decisions informed by high quality and relevant evaluation evidence'. (p. 6)

Yet in Figure 2, for example, it appears as ‘Improving the lives of Aboriginal and Torres Strait Islander people’. Wording should be used consistently throughout.

The final formatting must have clearer connections to all surrounding text, references and diagrams.

The phrase ‘put Aboriginal people at the centre’ is mentioned in text below the objective, and requires explanation – exactly what is meant by this, how, and who assesses centredness?

Provide examples of who the strategy applies to.

Identify in more detail exactly how the strategy relates to state and territory programs – they ‘could’ adopt it: who makes these decisions, who influences this, how will transparency best occur?

Principles

The principles should be in the same tense so they roll off the tongue (and page) easily. Changing ‘centring ...’ to ‘centred on ...’ would achieve this.

We suggest a sixth principle – culturally responsive. See below for our reasoning.

Use visual representations by an Aboriginal and Torres Strait Islander designer.

Ensure Aboriginal and Torres Strait Islander people’s writing is referenced to explain each of the principles, so that they are more clearly explained from Aboriginal and Torres Strait Islander people’s perspectives.

The missing link – priorities

As written, there is no clear link between the objectives, the principles and the actions. While there are many different ways to structure a strategy, all need a link between principles and actions. Using priorities is an appropriate option.

While priorities are not described as such, they can be elucidated by examining the text, along with figure 1 and tables 1-5, and the manner in which the actions are grouped. The priorities appear to be:

- centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges (this can be both a principle and a priority)

- building a culture of evaluation
- developing and maintaining whole-of-government priorities
- improving the quality of evaluation
- using evaluation to improve policies and programs.

Actions

Adding priorities would help tie the actions to the strategy logically.

But the actions, in the current draft, are flawed in that they are described as ‘supporting an evaluation culture’. It is not clear why actions have been developed to support only an evaluation culture, rather than the strategy itself. Having them support the principles and priorities – indeed the strategy itself – would make more sense.

Another consideration to note here is that establishing government-wide evaluation priorities (p. 22) is *not seen* as an action, yet is clearly *is* an action. We suggest it be incorporated – we will call it action 0 for ease of reading in this document, but recommend renumbering the actions in the final report.

We suggest that the Indigenous Evaluation Strategy be reorganised as follows:

Objective

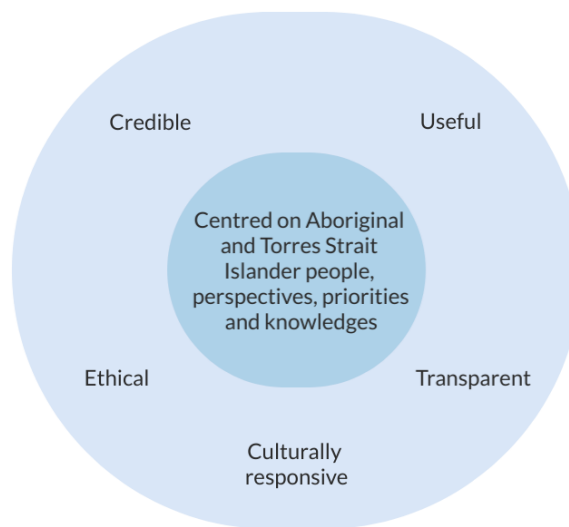
To improve the lives of Aboriginal and Torres Strait Islander people by having policy and program decisions informed by high quality and relevant evaluation evidence.

Principles

- Centred on Aboriginal and Torres Strait Islander people, perspective, priorities and knowledges
- Culturally responsive
- Credible
- Useful
- Ethical
- Transparent

A supportive illustration would follow naturally:

Figure 1: Principles of the Indigenous Evaluation Strategy



Priorities

- centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges
- building a culture of evaluation
- developing and maintaining whole-of-government priorities
- improving the quality of evaluation
- using evaluation to improve policies and programs.

Actions¹

- 0: Develop and maintain government-wide evaluation priorities
- 1: Agencies should systematically identify evaluation priorities and publish evaluation forward work plans
- 2: New policies and programs affecting Aboriginal and Torres Strait Islander people should be subject to an Indigenous Evaluation Threshold Assessment
- 3: The Office of Indigenous Policy Evaluation should provide guidance to agencies on conducting evaluation in line with the principles of the Indigenous Evaluation Strategy

¹ To be renumbered

- 4: Agencies, supported by the Head of Evaluation Profession, should ensure they have access to the skills they require to undertake or commission evaluations that are consistent with the strategy
- 5: Agencies should ensure that they have access to, or are able to collect, the data they need to effectively undertake evaluations under the strategy
- 6: A data dictionary should be developed to guide agencies on collecting and using data on core outcomes that are important for Aboriginal and Torres Strait Islander people
- 7: All evaluation reports should be published
- 8: Agencies should publish an accessible evaluation report summary
- 9: A central evaluation clearinghouse should be established
- 10: Agencies should publish a response to evaluation findings
- 11: Agencies' performance against the Strategy should be monitored by the Office of Indigenous Policy Evaluation
- 12: The Strategy should be subject to independent review after five years

The priorities and actions align as follows.

Table 1: Alignment between priorities and actions

Priorities	Actions												
	0	1	2	3	4	5	6	7	8	9	10	11	12
Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges													
Building a culture of evaluation													
Developing and maintaining whole-of-government priorities													
Improving the quality of evaluation													
Using evaluation to improve policies and programs													

Making such changes to the draft strategy would make it much more likely to be understood and implemented by its target audience.

On the report *Indigenous Evaluation Strategy (Draft) May 2020*

This part of our submission examines the IES draft as it is currently written.

In general, it appears that Aboriginal and Torres Strait Islander people are considered to be the *subjects* of evaluation, and as *invited participants* in the process of evaluation.

There is little sign that the strategy considers that Aboriginal and Torres Strait Islander people are designers or managers of policies and programs, or that Aboriginal and Torres Strait Islander people are researchers and evaluators.² And the document does not read as if Aboriginal and Torres Strait Islander people could be among its authors.

This oversight needs to be corrected. Otherwise, it perpetuates some of the stereotypes that are so damaging to Aboriginal and Torres Strait Islander people.

This oversight can be rectified by a thorough review of the strategy, and in particular tables 1-5, to ensure that Aboriginal and Torres Strait Islander are not treated as 'other' when it comes to discussion of policymakers, government and agency staff, evaluators or staff of the Productivity Commission. Or, indeed, Commissioners.

The voices of Aboriginal and Torres Strait Islander authors, researchers, policy makers, peak organisations, Elders and others must be included in the strategy document. Other leadership documents include, for example, Aboriginal and Torres Strait Islander languages, nations, concepts, quotes, examples and reference to cultural strengths including holism, spirituality, intergenerational care and connection to Country.

We note the absence of any efforts to support evaluation by Aboriginal and Torres Strait Islander people and organisations. The Commonwealth Government's Indigenous Procurement Policy aims 'to stimulate Indigenous entrepreneurship, business and economic development, providing Indigenous Australians with more opportunities to participate in the economy.'

We suggest that the strategy note that it would be preferable to have evaluation of policies and programs that affect Aboriginal and Torres Strait Islander people be

² We note that the possibility of Aboriginal and Torres Strait Islander people being evaluators is acknowledged on page 15 of the accompanying guide, but don't consider that acknowledgement enough.

carried out by Aboriginal and Torres Strait Islander people and organisations, where possible.³

We also note the lack of reference and alignment to existing policies and strategies regarding research involving Aboriginal and Torres Strait Islander people. For example, although the AIATSIS *Guidelines for Ethical Research in Australian Indigenous Studies* is referenced, its footprint is not apparent in the draft Strategy. The same can be said of the NHMRC's *Ethical Conduct in Research with Aboriginal and Torres Strait Islander Peoples and Communities: Guidelines for Researchers and Stakeholders*. We also note the lack of reference to the NHMRC's *Ethical Considerations in Quality Assurance and Evaluation Activities*. All three documents are widely used to guide evaluators working with policies and programs that affect Aboriginal and Torres Strait Islander people.

We also note the absence of acknowledgement of the harms done by research over time. Katz et al.⁴ say: 'The literature is very clear that the history of research and evaluation in Aboriginal communities has left a legacy of distrust, fear and anger by Indigenous communities worldwide to researchers.' We suggest this legacy be acknowledged.

We now examine the draft strategy page by page. Existing text in the strategy is in blue.

Foreword

I want to thank Commissioner Romlie Mokak for his outstanding leadership of this project, and the team, led by Rosalie McLachlan, which has combined strong intellect with new perspectives to tackle a unique set of policy challenges.

The foreword suggests that the challenge of evaluating policies and programs affecting Aboriginal and Torres Strait Islander people is unique and new. With respect, Aboriginal and Torres Strait Islander people have been facing this challenge for some decades. It is a challenge reflected in many parts of life – how to get governments to take note of the perspectives and knowledges of Aboriginal and Torres Strait Islander people?

³ We note again that the possibility of Aboriginal and Torres Strait Islander people being evaluators is acknowledged on page 15 of the accompanying guide, but don't consider that acknowledgement enough.

⁴ Katz I, Newton BJ, Bates S & Raven M, *Evaluation theories and approaches: relevance for Aboriginal contexts*, 2016, Sydney: Aboriginal Affairs, NSW Department of Education

While it is pleasing that the Australian Government has asked the Productivity Commission to examine this issue, and it is also pleasing that that Commission has responded with interest and vigour, the response could be considered overdue, rather than new and unique.

We suggest re-working the last sentence, so that it acknowledges the work done by Aboriginal and Torres Strait Islander people and community-led organisations that has led to this point.

Further, provide some information about Romlie Mokak and Rosalie McLachlan, to establish their credibility in leading this process, aligned with the very principle of this strategy.

Capability – in tables

Consider moving the row 'Building capability and a culture of evaluation' to be the second row. Evaluation planning, design, conduct and reporting are all reliant on a skilled workforce. Currently, most Australian Government employees have little access to training that supports them to be confident engaging with Aboriginal and Torres Strait Islander people. The overwhelming concern with this strategy is their lack of confidence then in safely designing and conducting evaluations.

Australian Government workforce development framework is required to ensure anti-racism, cultural competence, cultural safety and cultural responsiveness in service delivery as well as evaluation.

Page 4: Introduction

The Strategy provides a unique opportunity for the Australian Government to work with Aboriginal and Torres Strait Islander people to better evaluate policies and programs and achieve the shared goal of improving the lives of Aboriginal and Torres Strait Islander people.

Again, suggesting this strategy is unique appears misplaced. Governments and government agencies working with Aboriginal and Torres Strait Islander people should be the norm, and should not be considered unique or remarkable.

We suggest deleting this sentence.

Add an introduction to Indigenous peoples in Australia – diversity, strengths, cultures and visions. Consider adding a map of Indigenous Australia for visual stimulus about who this strategy ultimately affects.

Page 5

Evaluation can also help to build trust in government, particularly if the findings are used to support ‘learning by doing’ and those affected by the policy or program are able to work with government to find ways to achieve mutually beneficial outcomes.

Many Aboriginal and Torres Strait Islander people distrust governments, in part from having seen policies and programs that are beneficial to communities changed or de-funded. There is a risk that evaluations will not influence government policies, which are not always based on evidence.

We suggest changing ‘particularly’ to ‘but only’.

There are many policies and programs designed to improve the lives of Aboriginal and Torres Strait Islander people.

It is highly contentious, and perhaps inflammatory, to say that policies and programs are ‘designed to improve the lives of Aboriginal and Torres Strait Islander people’, without acknowledging that there are also many policies and programs that knowingly make the lives of Aboriginal and Torres Strait Islander people worse. An example is the 2014 policy decision to markedly reduce Commonwealth Government funding of many Aboriginal community-controlled organisations and programs.

We suggest saying: ‘There are many policies and programs that affect the lives of Aboriginal and Torres Strait Islander people, in both positive and negative ways.’

Page 6: Objective

There are four reasons for an Indigenous Evaluation Strategy:

- to centre Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges in evaluations of policies and programs that affect them
- to ‘lift the bar’ on the quality of evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people
- to enhance the use of evaluations to inform policy and program design and implementation by supporting a culture of evaluation and building a body of evidence and data on the effectiveness of policies and programs

- to promote a whole-of-government approach to priority setting and evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people.

We suggest a fifth reason – ‘to provide an action to support the right of Aboriginal and Torres Strait Islander people to self-determination’.

The Strategy applies to all Australian Government agencies with responsibility for designing and/or implementing policies and programs affecting Aboriginal and Torres Strait Islander people. The Strategy covers Indigenous-specific policies and programs as well as mainstream policies and programs that affect Aboriginal and Torres Strait Islander people.

We strongly support this statement. The greatest impact on the lives of Aboriginal and Torres Strait Islander people arises from mainstream policies and programs.

Page 8: Principles

The overarching principle of the Strategy is centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges (figure 2).

We agree with the importance of this principle. Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges *must* be central to any evaluation, or evaluation strategy, or it will fail.

But the mixture of overarching and centring is confusing. If this principle was described as the core principle, it would make more sense linguistically, and would also allow for simple representation in an illustration.

Add detail on how Australian Government employees can ‘centre’, and the steps they will be supported in to get to this quite deep result of engagement.

Outline here how frequent experiences of racism that Aboriginal and Torres Strait Islander government employees and service users will be addressed.

The four principles – credible, useful, ethical and transparent – are common to evaluation frameworks used by Australian Government agencies and reflect international good practice principles for evaluation.

We agree that these four principles are important, and that they reflect good practice. But we note that an important principle is missing – that evaluations be carried out in a culturally responsive manner.

Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges is an important element of cultural responsiveness, which is the mechanism by which cultural safety can be achieved. But cultural responsiveness goes beyond centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges. The Indigenous Allied Health Association says cultural responsiveness:

... is innately transformative and must incorporate knowledge (knowing), self-knowledge and behaviour (being) and action (doing). It is about the approaches we take in engaging with people and how we act to embed what we learn in practice. This requires genuine dialogue to improve practice ...

The emphasis on action in cultural responsiveness cannot be overstated: it is not enough to be well motivated or understand the need for change. Many of the architects and agents of policies designed to 'improve' Aboriginal and Torres Strait Islander health and wellbeing will have understood the symptoms and extent of disadvantage they sought to address. The inadequacy of many approaches is rooted in assumption, notions of cultural superiority and, often, well-meaning but culturally self-referenced approaches. Cultural responsiveness goes beyond knowing change is needed, to enabling safe approaches that deliver genuine impact.⁵

We suggest that cultural responsiveness be added as a fifth principle.

Add information about anti-racism, cultural competence and other training Australian Government employees will receive to engage well with Aboriginal and Torres Strait Islander people.

Page 10: Centring

This principle is at the core of the Strategy. Evaluations of policies and programs that seek to improve the lives of Aboriginal and Torres Strait Islander people need to engage effectively with Aboriginal and Torres Strait Islander people if they are to be credible, useful, ethical and transparent.

Again, we draw your attention to the words 'seek to improve'. This strategy seeks to cover mainstream policies and programs, many of which currently do not consider the impact on Aboriginal and Torres Strait Islander people.

⁵ Indigenous Allied Health Australia. Cultural safety through responsive health practice. 2013, updated 2019. Available from <https://iaha.com.au/wp-content/uploads/2020/02/Cultural-Safety-Through-Responsive-Health-Practice-Position-Statement.pdf> p3.

We suggest that the second sentence be replaced by the following: 'Evaluation of all government policies and programs need to engage effectively with Aboriginal and Torres Strait Islander people if they are to be credible, useful, ethical and transparent.'

Page 12: Credible

Evaluation approaches, methods and processes must be credible if policy and program design and implementation decisions are to be based on evaluation findings. Evaluations should be conducted by evaluators who are technically and culturally capable.

The text following this paragraph speaks in detail about the technical capability required, but does not again mention 'culturally capable'. Yet 'cultural capability' is central to having the ability to evaluate policies and programs that affect Aboriginal and Torres Strait Islander people.

We suggest adding the following text: 'Aboriginal and Torres Strait Islander people are more likely to accept an evaluation as credible if it is carried out in a culturally responsive manner, with the issues that are important to Aboriginal and Torres Strait Islander people being explored in a way that Aboriginal and Torres Strait Islander people see as relevant.'

Page 14: Useful

Simply put, evaluations that are not used represent missed opportunities for learning and accountability.

OECD (2020, p. 63)

This quote refers to evaluations *being used*, which is very different from them being useful, which is the principle the quote attaches to. Things can be useful, but not used. And they can be useless, but used.

We suggest removing this quote.

Evaluations are most useful when they are of high quality (the results are credible) and they are timed to contribute to policy-making decisions.

This is true. But it assumes that policy-making decisions are made in a predictable manner, which is only sometimes true.

Evaluations are also very useful when they are concerned with policies and programs that Aboriginal and Torres Strait Islander people find effective, or find ineffective, so that the knowledge held by Aboriginal and Torres Strait Islander people can be available at the time it is needed.

We suggest that sentence be changed as follows: 'Evaluations are most useful when they are of high technical quality, are carried out by culturally responsive evaluators, are desired by Aboriginal and Torres Strait Islander people, and can contribute to policy-making decisions.'

Page 16: Ethical

For example, where evaluation relies exclusively on existing or de-identified data, formal ethical review may not be necessary.

This is potentially misleading. There are many situations where an evaluation relying exclusively on existing data would require formal ethical review and approval. In fact, the NHMRC's *Ethical Considerations in Quality Assurance and Evaluation Activities* specifically warns that secondary use of data is a trigger for considering that formal ethical review may be necessary (p. 3).

We suggest deleting this sentence.

Page 20: Maturity

The maturity model will be developed in more detail between the draft and final Strategy.

While we understand that some aspects of developing this strategy will proceed at a different pace to others, it is unusual to see a placeholder in a draft strategy for something that could potentially be important.

It is unclear what 'a maturity approach' is. Based on the text presented, it seems to be simply an acknowledgement that some agencies are and will be better than others at evaluating policies and programs affecting Aboriginal and Torres Strait Islander people.

But is a maturity approach simply descriptive? Or will it be used on a way to support accountability? We hope the latter.

We suggest that the Productivity Commission should continue its path of consultation with Aboriginal and Torres Strait Islander community members by facilitating processes for interested parties to see a draft of the text of this chapter when it is developed. That could be handled separately from a full consultation – perhaps as an email to all who have previously made submissions.

Page 21: Roles and responsibilities

A new Office of Indigenous Policy Evaluation (OIPE) is proposed. The Office would oversee the implementation of the Strategy and coordinate a whole-of-government approach to evaluating policies and programs affecting Aboriginal and Torres Strait Islander people. It is proposed that the Office would sit within an existing independent statutory authority of the Australian Government.

We strongly support the establishment of an Office of Indigenous Policy Evaluation.

We support the submission of the independent members of the Indigenous Evaluation Council National Indigenous Australians Agency that the OIPE be situated in an independent agency such as the Productivity Commission.⁶

We strongly suggest that the majority of OIPE's senior management be Aboriginal and/or Torres Strait Islander people.

Oversight of the Strategy should also include governance arrangements that ensure effective engagement with Aboriginal and Torres Strait Islander people.

To facilitate this, it is proposed that an Indigenous Evaluation Council (the Council), with a majority of Aboriginal and Torres Strait Islander members, be established to work with the OIPE.

We strongly support these governance arrangements. We also suggest that the Council represent the diversity of Aboriginal and Torres Strait Islander people with a mix in gender, age, geographical location, education, employment and caregiving experience.

⁶ Submission by Walter M, Cram F, Dillon A & Jarvie W, 12 July 2020.

Page 22

We have considered how reasonable it is to have set up draft priorities, especially in light of the strategy not being co-created by Aboriginal and Torres Strait Islander people. Identifying priorities without Aboriginal and Torres Strait Islander people's leadership and contributions risks replicating disempowering process of the past.

Table 6 can now be updated to reflect the new Closing the Gap targets.

A priority-setting process should be run by the OIPE and Indigenous Evaluation Council, Australia-wide. It must be resourced to ensure diversity of Aboriginal and Torres Strait Islander peoples, and involvement of community members not only service providers, peak bodies and researchers.

*On the report **A Guide to Evaluation Under the Indigenous Evaluation Strategy (draft)***

We provide only brief comments on the guide, but suggest that it needs the same rigorous review process as the draft strategy.

Page 1

Evaluation — the systematic assessment of a policy or program’s design, implementation and outcomes — is about understanding what **governments** are doing right, what they are getting wrong and where they can do better.

That is true of evaluation of government programs. But this strategy will be used more broadly than by governments, and needs to be applicable in a wide variety of situations.

We suggest replacing the word ‘governments’ with ‘organisations, policies or programs’.

To achieve better policy outcomes, Aboriginal and Torres Strait Islander people need to be at the centre. What **they** value, their expertise and lived experience should be reflected in what is evaluated, how evaluation is undertaken and the outcomes policies seek to achieve. If the outcomes of policies are not what is valued by Aboriginal and Torres Strait Islander people, then the policies have limited value and little prospect of success.

The use of the word ‘they’ (bolded) suggests that Aboriginal and Torres Strait Islander people are not the author of this document, and are not the reader. It suggests Aboriginal and Torres Strait Islander people are the subject of the policies and programs, but have no other roles. This is not placing Aboriginal and Torres Strait Islander people at the centre.

We suggest rephrasing that sentence to read: ‘The values, expertise and lived experience of Aboriginal and Torres Strait Islander people should be reflected’

We suggest that the draft strategy be searched thoroughly for other such occurrences.

Page 20

The choice of type of evaluation and approach should maximise the rigour and credibility of the evaluation given the questions the evaluation seeks to answer, the nature and scale of the policy or program, resourcing and data constraints.

The choice and type of evaluation and approach should also be influenced by what Aboriginal and Torres Strait Islander people want, if the principle of centring ‘Aboriginal and Torres Strait Islander people, perspective, priorities and knowledges’ is to have meaning.

It should also take into account the evaluation methods preferred by Aboriginal and Torres Strait Islander people. This has been explored by Katz et al,⁷ who say:

In general the literature indicates that constructivist and participatory methods are more conducive to evaluations in Aboriginal communities than positivist or quantitative methods. This is because positivist methodologies by definition objectify research subjects and the theory behind this approach asserts that there is one ‘objective’ truth. Constructivist approaches, on the other hand, acknowledge the diversity of experiences and viewpoints, and do not attempt to identify a single objective truth. Nevertheless, quantitative and economic evaluation methods can be used if they are conducted in accordance with the principles and protocols of Aboriginal research, and in particular that communities participate in designing the research and interpreting the findings. (p. 36)

Information requests

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?

Consider the United Nations Declaration on the Rights of Indigenous Peoples here, extending beyond engagement and co-creation, to instead seek self-determination. Aboriginal and Torres Strait Islander peoples have well-established local, regional, state and national governance arrangements, as well as the Coalition of Peaks through which priority setting, evaluation design and other decisions can be facilitated.

Australian Government employees, of whom few are Aboriginal and Torres Strait Islander peoples, will require training and support about engagement, and this must be identified in an implementation plan, and be adequately resourced.

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

⁷ Katz I, Newton BJ, Bates S & Raven M, Evaluation theories and approaches: relevance for Aboriginal contexts, 2016, Sydney: Aboriginal Affairs, NSW Department of Education

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?

The 16 new Closing the Gap targets are more comprehensive than before. However, missing is the work to ensure the cultural competence, safety and responsiveness of the mainstream Australian Government workforce, as well as anti-racism strategies, and their training in evaluation with Aboriginal and Torres Strait Islander peoples.

If the IES is to be conducted by Australian Government employees, a clear plan and resourcing for their development is required.

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?

'Housing' misrepresents the importance of the clearinghouse and its use. The AIHW and AIFS have not demonstrated depth of engagement with Aboriginal and Torres Strait Islander people, cultures or resources in the past or currently, favouring advisory models with limited influence of Aboriginal and Torres Strait Islander people. A new approach is required. The Productivity Commission and OIPE are arguably more neutral and independent.

INFORMATION REQUEST 7.2 The Commission is seeking participants' views on the location of an Office of Indigenous Policy Evaluation to oversee Australian Government agencies' implementation of the Indigenous Evaluation Strategy. Which current statutory agency would provide the best location for the Office of Indigenous Policy Evaluation, and why?

An Office of Indigenous Policy Evaluation location in the Productivity Commission is preferable to any other currently existing agency. It is established, has its focus best use of resources, has established processes and profile for reporting on progress and has staff skilled in evaluation. However, more staff, including Aboriginal and Torres Strait Islander staff and those highly training in working with Aboriginal and Torres Strait Islander people toward self-determination must be employed.

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?

A wider nomination process is required than through Aboriginal and Torres Strait Islander community-controlled health organisations. A widely-advertised Expression of Interest process is required. Aboriginal and Torres Strait Islander community-controlled health organisations represent only a small proportion of communities. Diversity in age, gender, geographical location and life experiences is required. The host agency suits for membership, yes.

INFORMATION REQUEST 9.1 The Commission is seeking feedback on the indicators that are highest priority for inclusion in the data dictionary. What outcomes and indicators are most informative for government and Aboriginal and Torres Strait Islander people?

This requires a considered process for achieving understanding, to represent the diversity of Aboriginal and Torres Strait Islander peoples' perspectives.

INFORMATION REQUEST 9.2 Which data linkages would best support the Indigenous Evaluation Strategy? Which data linkages are important to Aboriginal and Torres Strait Islander people?

A process of Aboriginal and Torres Strait Islander people deciding on linkages important to them is required. Undertake a strategic, transparent and inclusive process facilitated by Aboriginal and Torres Strait Islander people to inform priorities, data dictionaries, data linkages and other key decisions such as about outcome measures, definitions of 'success' and translation of evaluation findings into decisions about policies, programs and resourcing.