

Response to the Indigenous Evaluation Strategy Issues Paper

Background

The Productivity Commission has been asked to develop and monitor a whole-of-Government Indigenous Evaluation Strategy (IES) for the purpose of evaluating **all** policies and programs affecting ATSI people (i.e. Indigenous specific programs as well as mainstream programs that are accessed by ATSI people).

The Commission has been asked to:

- establish a principles-based framework for the evaluation of policies and programs affecting Indigenous Australians;
- identify priorities for evaluation; and
- set out its approach for reviewing agencies' conduct against the Strategy.

RDA NT is not able to comprehensively address all the questions raised in the Issues Paper. Some of the questions can only be answered by Australian Government agencies. However, we are able to provide comment in relation to the overall approach to developing the IES, composition and principles that should be incorporated into an IES, funding/costs, as well as highlighting potential risks.

Comments

We support highly targeted monitoring and evaluation in principle, where the primary purpose is to ensure that programs and policies result in better outcomes on the ground.

There is, however, a high degree of risk that this Strategy, with the best intentions, may evolve into a blunt instrument with perverse outcomes. It could also become a 'tick and flick' exercise which consumes resources without adding value. These concerns stem from the collective experience of our Committee members and staff in relation to program and policy delivery, especially in remote and very remote areas.

The development of this Strategy is said to be motivated by calls from the ATSI community for "a greater focus on monitoring and evaluation to improve program design, delivery and accountability" (p1), and the Strategy has the "overriding objective of delivering better outcomes for Aboriginal and Torres Strait Islander People" (p2).

However, its development is not being led by an Indigenous organisation. The United Nations Declaration on the Rights of Indigenous Peoples Article 5 affirms that Indigenous people have the right to pursue their own cultural, political, legal, economic, and social development *at the same time* as pursuing some, none or fully participating in mainstream development trajectories.

A “top-down” approach is evident in the structure and content of the Paper, which suggests that perhaps the main beneficiaries are meant to be the various Australian Government agencies responsible for developing and delivering Indigenous policies and programs.

For the Strategy to be truly effective and beneficial to ATSI people, it is critical that Indigenous organisations and communities play a central role in its design. This will ensure appropriate cultural frameworks and principles, true “buy-in”, and measures of success defined by the recipient rather than the provider. It is disappointing that the Issues Paper does not appear to have been developed with peak Indigenous organisations.

Instead, the work to date on the IES by the Productivity Commission may have created a perception from the outset that the primary benchmark by which programs will be evaluated will be economic. Non-economic measures appear to be of lesser or little importance, even in the context that they have economic flow-on effects.

We agree that the Strategy should include 1) a principles-based evaluation framework for policies and programs (including the provision of guidance regarding planning for, administering, conduct of, and responding to evaluations) as well as 3) processes and institutional characteristics required to promote the adoption and success of the IES. Regarding 2) the identification of evaluation priorities, we suggest a tiered and more flexible approach is adopted rather than simply identifying the selection criteria (size of program, location etc) or prioritising individual programs and policies (noting these can be subject to frequent and sometimes unexpected changes).

Specifically, the Strategy should identify the process by which priorities are identified. Given the intended beneficiaries of the overall IES, this process should embed the centrality of Indigenous organisations and communities in this decision-making, consistent with the *UN Declaration of the Rights of Indigenous Peoples*.

In this regard we make the point that there is no one-size-fits all approach. What one community or organisation may consider to be a success, may not be considered successful elsewhere; **it is critical that the evaluation of any program in a particular community/location, occurs within the local context.**

We propose that the IES cannot have a blanket application to both mainstream and Indigenous specific policies and programs. A separate set of protocols and principles would need to be developed for the evaluation of Indigenous specific programs, and to guide the evaluation of programs in Indigenous communities.

At a minimum, the principles for an evaluation framework must include the ethical conduct of monitoring and evaluation activities, including prior free and informed consent and freedom to withdraw from participation at any time without fear of repercussions such as loss of funding, in line with standard ethical research practice.

It is our experience that the success, credibility and validity of any monitoring and evaluation activity depends upon building relationships and establishing a high degree of trust between the evaluators and the program/community participants. This level of trust can take months or years. Monitoring and evaluation timeframes (and budgets) must factor in this requirement. It is our view that it would be better to have a dedicated team of evaluators assigned to geographic areas. Strong and lasting relationships help to mitigate community fatigue with constant policy and program change.

It is also essential that the results of any monitoring and evaluation activity undertaken in a community/organisation are communicated back to that community/organisation in a timely manner. Not doing so undermines trust and makes people less inclined to participate in future monitoring/evaluation activities. The requirement to report back to participants, including clearly outlining follow-up actions (i.e. responses to the evaluation by agencies), should become one of the principles.

The cost of implementing an IES should not be underestimated, particularly where there is no existing baseline data or where data is known to be unreliable. This is often the case for communities in remote and very remote areas, and particularly Indigenous communities¹. The cost of evaluation must not reduce existing program funding as this will ensure perverse impacts and is inconsistent with the overriding objective of the Strategy.

It is also important that the evaluation costs are not pushed onto those organisations who are delivering services. For example, small-medium not-for-profit organisations have limited capacity and it is important that they do not end up being the ones who are charged with data collection. We note that the Commission's view is that data collection should be undertaken by participants (p36). One of the principles should be "first do no harm" in respect to extra work, costs and strain on the organisation/communities involved.

It is equally a concern if remote/very remote areas do not witness any evaluation activity. We note that the Commission has highlighted that there "will always be instances where evaluation is not feasible or cost-effective" (p18). It will always cost more to undertake evaluations in remote/very remote areas. There is a risk that programs are only evaluated in cities or inner regional areas, and those findings are applied across the board. This will also result in perverse outcomes.

The ASTI population represents less than 6% of any state or territory with the exception of the NT, where it represents 30%. Any strategy that is built around a characterisation of the ASTI population as being predominately based in major urban or regional cities may not work for the NT where 76% of the ASTI population lives in remote areas.

¹ As an example, research by Griffiths University between 2016 and 2019 revealed the extent of the disparity that can exist between existing datasets (such as the ABS Census data) and the situation on the ground in very remote regions. Griffiths found there were three times as many artists in the Barkly LGA for whom the arts were their main source of income, and a minimum of 550 artists registered with the four main art centres/organisations in the Barkly LGA, compared with the 8 recorded by the 2016 ABS Census of Population and Housing.

We note that examination of current evaluation practice has focussed only on Government evaluation practice. This is a very narrow view; we suggest that the Commission broadens their consideration to include examples of evaluation work undertaken by the not-for-profit and academic sectors. For example, Dunphy's (2015)² work on arts-led holistic development offers theoretical ideas and an evaluation framework for conceptualising the role of arts in "progress" across inter-related cultural, personal well-being, social, economic, civic and ecological domains. The application of Indigenous knowledges in contemporary development and evaluation approaches has been explored by Williams (2018)³, and specifically the application of *Ngaa-bi-nya* (which means to "examine, try, and evaluate") in the Wiradjuri language of central NSW.

We note that the Productivity Commission may be conducting evaluations and have some concerns that this may result in the adoption of a limited economic cost-benefit approach towards measuring the success of policies or programs. Most policies or programs affecting Indigenous Australians have (or should have) more complex objectives. Measures of success must take into account both the economic and cultural/social impacts, including neutral or negative outcomes.

Given that the Commission will be responsible for reviewing agencies conduct of evaluations against the Strategy, we do not believe that it would be appropriate for the Commission to also be conducting evaluations. Instead we suggest that a dedicated evaluation unit be established, employing qualified evaluators, with evaluation teams assigned to geographic areas. This would ensure that the Strategy is underpinned by an appropriate degree of rigour, transparency and credibility.

² Dunphy, K. 2015. A holistic framework for evaluation of arts engagement. In *Making Culture Count* (pp.243-263), Palgrave Macmillan, London.

³ Williams, M. 2018. *Ngaa-bi-nya* Aboriginal and Torres Strait Islander program evaluation framework. *Evaluation Journal of Australiasia*, 18(1), 6-20.