

Jobs Australia Submission to Productivity Commission's Indigenous Evaluation Strategy

August 2019



Jobs Australia



Contents

1. About Jobs Australia	3
2. About this Submission.....	3
3. Summary of Recommendations.....	3
4. Introduction	4
5. Response to issues listed by in the Discussion Paper	4
6. Conclusion.....	11

Thank you for the opportunity to make this submission on behalf of Jobs Australia’s members.

Sincerely

Nicole Steers
Acting CEO, Jobs Australia

1. About Jobs Australia

Jobs Australia is the national peak body which helps not-for-profit employment and community services all over Australia to provide the best possible assistance to disadvantaged communities and people.

With our expertise in employment services, and because we are funded solely by our members, we can advocate to government and others for what's right and best in helping unemployed people - with real insight and an independent voice.

We represent the largest network of not-for-profit employment-related community services in Australia - with members ranging from small local community agencies to large national charities.

2. About this Submission

The views expressed in this submission are the views of Jobs Australia. While our views are informed by our consultations and meetings with our members, they should not be taken to be the views of any provider or group of providers.

3. Summary of Recommendations

1. Resourcing to evaluate funded programs should be built into government program budgets.
2. The Strategy should enable the evaluation of mainstream programs which provide support to Aboriginal and Torres Strait Islander people, which may require building cultural capacity, additional resourcing, data reconfiguration and community participation.
3. The Strategy support an evaluation process which captures local factors which may be lost in the aggregation of data for national programs.
4. The Strategy should support a process where evaluations are undertaken in a manner that is perceived to be independent, transparent and free from political interference.
5. The Strategy should prioritise the independence of evaluators.
6. A presumption that evaluations be publicly available should be the standing expectation

4. Introduction

Jobs Australia (JA) welcomes the opportunity to contribute to the Productivity Commission's Discussion Paper entitled *Indigenous Evaluation Strategy* noting the dire need to capitalise on what works in addressing harm and disadvantage within Aboriginal communities and contributing to the development to a systemic process of review of impacting initiatives and programs.

JA's response to the Discussion Paper will reflect the expertise and experience of our membership, being not for profit Employment Services, as well as best practice in achieving optimal employment outcomes.

JA notes the Treasurer's intent to develop a whole of government evaluation strategy to support programs which support Aboriginal Australians. This worthwhile commitment requires ongoing resourcing and a level of drive which captures programs supported at all levels of government as well as endeavour supported through alternative funding sources. Achieving a comprehensive whole of government commitment will likely be a complex challenge.

JA will below detail responses to the questions listed in the Discussion Paper.

5. Response to issues listed by in the Discussion Paper

What objectives should a strategy for evaluating policies and program affecting Aboriginal and Torres Strait Islander people seek to achieve?

The overall objective of the strategy is to create a framework that creates a strong evidence base regarding understanding of the degree of effectiveness and efficiency of policies and programs affecting Aboriginal and Torres Strait Islander people.

It is vital that scarce resources are well allocated to ensure that key objectives are met that deliver positive outcomes for impacted communities and that the evidence of these outcomes is collected and utilised to further enhance program activities.

The objectives of this strategy should reflect ongoing best practice, security in tenure for evidence informed programs, determining the value and scope of capacity building endeavour, including cross sector capacity building within impacted workforces and the broader achievements in overall wellbeing which lie beyond the scope of a specific stream of programmatic activity.

The Strategy should ensure that an allocation is afforded to funded programs to carry out necessary evaluation.

Recommendation 1: Resourcing to evaluate funded programs should be built into government program budgets.

To what extent are the evaluation practices of Australian Government Agencies consistent with the United Nations Declaration on the Rights of Indigenous Peoples? How could practices be improved in this respect?

Do you agree with the main components of an Indigenous Evaluation Strategy suggested by the commission? Should other components be included? If so, why?

The components of the Indigenous Evaluation Strategy outlined in the Discussion Paper provide a useful framework for this endeavour. We note the following:

1. The Discussion Paper notes the 'role of Aboriginal and Torres Strait Islander people will be an essential component' without specifying the level of participation. The strategy should instead assert that the participation and ownership of Aboriginal and Torres Strait Islander people is a crucial element in progressing an effective strategy.
2. National programs such as the Community Development Program have been evaluated in aggregate which diminishes the value in determining local issues and solutions specific to certain regions. The Strategy should provide for local place-based evaluation to determine need and ascertain programmatic efficacy in achieving stated goals as well as broader aspects of wellbeing. Local placed based evaluation endeavour should not identify specific programmatic participants.
3. The intentions of whole-of-government strategies often are not met due to challenges in drawing together the necessary departments, stakeholders and levels of government, as well as the associated bodies which collect and assess data, in a collaborative manner. A resource would need to be allocated to drive collaboration and ensure that data linkage is progressed.

What is the best way to address mainstream programs in the Indigenous Evaluation Strategy?

Mainstream Employment Programs maintain a large portion of Aboriginal and Torres Strait Islander participants, with 71,873 of the jobactive caseload being identified as Aboriginal and Torres Strait Islanders¹, consisting of approximately 10 percent of the entire caseload. The CDP program supports 33,000 people of which approximately 26,000 identify as Aboriginal and Torres Strait Islanders.² The majority, amounting to two thirds of unemployed Aboriginal and Torres Strait Islander people engage jobactive, the mainstream employment program.

There is a need to develop mechanisms within the reporting structure of mainstream programs to ascertain program specific and broader outcomes associated with programmatic interventions. As a corollary to this priority, there is a pressing need to ensure that mainstream programs are culturally sensitive and that principles of co-design are evident. The Strategy should provide the tools to

¹ Australian Government. 2019. Labour Market Portal. ER Summary Data July 2019.

<http://lmip.gov.au/default.aspx?LMIP/Downloads/EmploymentRegion>

² National Indigenous Australians Agency. 2019. The Community Development Program.

<https://www.niaa.gov.au/indigenous-affairs/employment/cdp>; ANAO 2018. Design and Implementation of the Community Development Program, [https://parlinfo.aph.gov.au/parlInfo/download/publications/tables/papers/7f0f859d-a8ed-4d89-9f7b-7b93bc497c1f/upload_pdf/opd%20-%20community%20development%20program.pdf;fileType=application%2Fpdf#search="publications/tables/papers/7f0f859d-a8ed-4d89-9f7b-7b93bc497c1f"](https://parlinfo.aph.gov.au/parlInfo/download/publications/tables/papers/7f0f859d-a8ed-4d89-9f7b-7b93bc497c1f/upload_pdf/opd%20-%20community%20development%20program.pdf;fileType=application%2Fpdf#search=)

identify and progress any necessary cross sector capacity building and associated cultural sensitivity training as well as direction to establish collaboration where necessary.

Recommendation 2: The Strategy should enable the evaluation of mainstream programs which provide support to Aboriginal and Torres Strait Islander people, which may require building cultural capacity, additional resourcing, data reconfiguration and community participation.

What lessons from these and other major Australian Government programs impacting on Aboriginal and Torres Strait Islander people would be useful in developing an Indigenous Evaluation Strategy?

As peak for the not for profit Employment Services sector, JA will reflect primarily on CDP and potential lessons to be learnt from the 2018 evaluation.

The CDP program operates in regions where employment opportunities are often scarce, with the local community often facing high levels of adversity across a range of indicators which extend beyond the challenges associated with isolation and remoteness. While this is acknowledged in the *Evaluation of Participation and Employment Outcomes*³ for CDP, specific local factors are largely lost through the aggregation of the data and the limited criteria relating specifically to the various programmatic requirements such as participation, payment suspension and employment outcomes.

Broader assessment, across all impacting funded programs should be progressed so outcomes can be measured against the entirety of programmatic activity.

Evaluation outcomes should be appended to an agenda of reform, where the findings can be located within the context of outcomes and translated into pragmatic programmatic modifications as required. An implementation plan detailing how the findings will impact upon the operation of a specific program should be developed.

Recommendation 3: The Strategy support an evaluation process which captures local factors which may be lost in the aggregation of data for national programs.

How can the challenges and complexities associated with undertaking evaluation be overcome – both generally, and in Indigenous policy specifically?

The Discussion Paper outlines a range of valid concerns regarding the programmatic evaluation. The relevance of elements relating to cost and resourcing can be measured against the level of priority afforded progressing useful evaluations.

Challenges associated with evaluating mainstream programs with a sizable cohort of Aboriginal and Torres Strait Islander participants can also be complex and require a high level of sophistication with the data and methodology employed.

CDP presents significant challenges, as approaches to aggregate data from a broad range of diverse remote regions may result in outcomes which are not representative of some regions. Furthermore,

³ DPMC 2018. The Community Development Program; Evaluation of Participation and Employment Outcomes.

specific nuances related to regions may remain undetected. Working with local communities and providers on a region by region assessment will capture a more complete and accurate picture of CDP outcomes.

What principles should be included in an Indigenous evaluation framework to be used by Australian Government agencies?

JA recommends that the development of principles be undertaken with Aboriginal and Torres Strait Islander communities and their representatives. This will help to ensure that programs are co-designed and consistent with their priorities.

Evaluations must be undertaken in a manner that is perceived to be independent, transparent and free from political interference.

The results of evaluations must be released in a timely and transparent way to guide reform.

Recommendation 4: The Strategy should support a process where evaluations are undertaken in a manner that is perceived to be independent, transparent and free from political interference.

Is evaluation funded out of program budgets or from a central evaluation budget within agencies?

CDP providers have not received any allocation to conduct evaluations. The Department of Prime Minister and Cabinet conducted an evaluation in 2018 which is noted in the Discussion Paper. This was undertaken as a separate activity and did not impact upon funding arrangements with CDP providers. At time of writing, there has been no indication of a follow up evaluation.

How are Aboriginal and Torres Strait Islander knowledges, perspective and priorities currently incorporated into the design and conduct of Australian Government evaluations and Indigenous-specific and mainstream policies and programs? How could this be improved?

While the CDP program maintains various requirements regarding participation and expectations relating to mutual obligation which are determined by government, CDP providers can work with local communities to determine various programmatic aspects which align with the expectations of government. Consultation occurs within the existing framework of program rules, but the rules themselves do not incorporate Aboriginal and Torres Strait Islander knowledges, perspective and priorities.

This could be improved by giving communities greater control over how remote employment and participation services are delivered, combined with Aboriginal and Torres Strait Islander oversight at

all levels of government. Such an approach is reflected in the Fair Work and Stronger Communities proposal, developed by a coalition of Indigenous and non-Indigenous agencies⁴.

What are the key actions and decision agencies should take when planning for early evaluation?

Agencies should ensure that the necessary planning and capacity are evident in program design to accommodate a suitable evaluation process. This equates to maintaining local circumstances, including the collection and collation of data, to optimise any evaluation process. When purchasing services, the government should ensure that the budget maintains adequate elasticity to provide for a suitable evaluation process and that providers are supported to facilitate any evaluative process. Best practice would incorporate the principles and mechanics of evaluation in program design, effectively enabling an evaluation process from the commencement of a funded program.

It is critical that evaluation is planned early, to enable the collection of baseline data and to accurately measure as far as possible the impact of a policy or program.

What degree of independence between evaluators and policy makers/program delivery areas is necessary and/or desirable?

There are issues relating to transparency and potential conflicts of interest in cases where either the providing agency or funding department also lead the evaluative process. In both cases, the design and content of any evaluative process may have financial implications. The perception of this conflict can erode confidence.

Ideally, evaluations should be conducted externally; in cases of internal evaluation, an independent review of the process and outcomes should be conducted.

Recommendation 5: The Strategy should prioritise the independence of evaluators.

Should all evaluation reports be published? In what circumstances might it be appropriate to not publish evaluation reports?

There should be a presumption that all evaluation reports are made publicly available in a timely fashion. Aside from providing assurance and confidence in the integrity of government, the publication of evaluations ensures that learnings can be readily picked up by relevant stakeholders and more readily adapted.

Circumstances where publication may not be suitable include where sensitivities are evident in the evaluation, creating a risk of harm to a specific cohort or where individuals may be identified. In such

⁴ Fair Work and Strong Communities Alliance 2017. Fair Work and Strong Communities: Proposal for a Remote Development and Employment Scheme, <https://www.fairworkstrongcommunities.org/>

cases, a modified version that protects program participants may need to be developed which both captures the learnings and retains participant anonymity.

Recommendation 6: A presumption that evaluations be publicly available should be the standing expectation.

What supporting features and arrangements are important for the successful implementation and operation of a principles-based Indigenous evaluation framework and accompanying list of evaluation priorities?

A key element to the implementation and operation of a principles-based indigenous evaluation framework is community input and ownership from the genesis of the process. Additionally, ensuring resourcing is available to remunerate community participation would be demonstrative of the value of community input and should be a priority.

What principles should be used to determine evaluation priorities?

The evaluative climate for each specific program should be considered, reflecting on the frequency of evaluations, prior evaluations and significance of the findings/recommendations and the acuteness or severity of the issues which the program seeks to ameliorate.

Programs which maintain a high level of community dissatisfaction, suboptimal outcomes or which have a poor record of evaluation should be prioritised.

Developing a succinct means of evaluation, including the availability and quality of data and how success is measured, should be prioritised.

How much scope do you consider there is to improve evaluative culture, capability and capacity for both those who undertake evaluation, and those who participate in the evaluation process? And how might improvements be achieved?

Regarding CDP, there is considerable scope to improve evaluative culture, as providers have not been supported to conduct local evaluations or engage with external consultants to assist in capitalising on positive outcomes. The absence of support in this space has resulted in providers adapting their program learnings through anecdotal and observational reflections and through consultation with local communities.

Program funding for CDP should include scope for local evaluation/program review to build on best practice.

What approaches and models should be implemented to ensure that Australian Government agencies comply with the Indigenous Evaluation Strategy?



Compliance with the Strategy is central to its success. Compliance measures need to capture various levels of government, statutory bodies, not for profit and for profit services and a range of other entities. A base level of compliance could be achieved through the publication of non-compliance with the application of penalties for ongoing non-compliance.

For agencies, ongoing non-compliance could be linked to contractual obligations.

Where possible, legislation compelling compliance and participation from Departments is optimal.

How do you think the process for reviewing and revising the Strategy should be structured?

A rolling set period for reviewing the Strategy should be established, which would involve, at a minimum, a desk top review of its efficacy. Opportunities for public involvement in the review, prioritising Aboriginal and Torres Strait Islander involvement should be progressed.

The composition of the experts involved in evaluating the Strategy should be determined through consultation with Aboriginal and Torres Strait Islander community leaders.



6. Conclusion

JA supports the development of an Indigenous Evaluation Strategy. Concerns remain regarding the provision of necessary resources to operationalise and drive the Strategy, meaningful involvement of Aboriginal and Torres Strait Islander communities and leaders and how any resulting recommendations for specific programs are actioned, aligning to governmental accountability to the Strategy.

JA welcomes any further engagement in this process.