

**Submission to Productivity Commission Inquiry:
Indigenous Evaluation Strategy
The Victorian Aboriginal Child Care Agency
August 2019**

The Victorian Aboriginal Child Care Agency (VACCA) welcomes the opportunity to provide input to the Australian Government's Indigenous Evaluation Strategy (IES).

VACCA is the lead Aboriginal¹ child and family welfare agency in Victoria, with 40 years of experience and expertise as an Aboriginal Community Controlled Organisation (ACCO) which supports and advocates for the needs of Aboriginal children, young people and their families. We provide programs and services to promote Aboriginal culture and encourage best parenting practices and advise government in relation to child abuse and neglect in the Aboriginal community. We deliver approximately 50 programs across the state, offering a broad range of services which:

- Ensure child safety and community well being
- Provide targeted support for Aboriginal children, young people and their families
- Maintain and build strong connections to Aboriginal culture
- Promote culturally specific ways of growing up Aboriginal children

We work across a wide range of program areas including family violence, integrated family services, child protection, cultural strengthening programs, mental health, financial services, justice, early years, and homelessness services.

VACCA is largely funded by the Victorian State Government, in particular the Department of Health and Human Services, the Department of Justice, and the Department of Education. VACCA also receives Australian Government funding for Family Violence Programs, Koori Kids Supported Playgroups, Link-up, and a new youth justice initiative, Youth Through Care. VACCA receives some philanthropic funds.

In recent years VACCA has significantly increased its investment in evaluation and research with the development of a Research and Evidence Development Team. Underlying VACCA's investment is recognition of the practice wisdom contained within the organisation, that outcomes for VACCA's clients are not necessarily identified in mainstream programs, and that Aboriginal people and organisations need to play a stronger role in determining outcomes and measures of success.

As part of an organisation wide project, VACCA is seeking to develop consistent practice across the organisation, develop an organisational wide outcomes framework (including indicators), has developed a principles-based Evaluation Framework and is now implementing a significant change process throughout the organisation to build a culture of evaluative thinking. This consists of the following components:

- Collaborative development of program logics per program with program teams
- Development of monitoring and evaluation plans for each program
- Customisation of a client information management system to capture the short, medium and long-term outcomes based on logics
- Support from the in-house evaluation team to monitor progress against outcomes and make meaning out of data

¹ The term Aboriginal refers to both Aboriginal and Torres Strait Islanders

- Reporting of data up the line to inform decision making
- Training of team leaders in evaluative thinking
- Building a culture of continuous learning through monitoring and evaluation to support and make programs accountable for outcomes.

Indigenous Evaluation Strategy

VACCA welcomes the development of an Australian Government Indigenous Evaluation Strategy. Consistency in approaches is important but it is also important that there is alignment with how Aboriginal programs and policies are being evaluated at the state and territory level.

VACCA welcomes the principles-based approach for the evaluation strategy. VACCA also welcomes the recognition of the United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP), in particular Articles 18, 20, 23 and 34. VACCA strongly endorses an evaluation strategy which upholds the key self-determination principles, cites the declaration and specific articles which are applicable to its implementation. Additional guidance on how the principles should be enacted will be needed to ensure that agencies abide by the principles in commissioning and implementing evaluations.

An overarching vision statement would strengthen the strategy by providing a clear statement of purpose for the strategy.

VACCA recommends that further detail is provided in the IES on implementation arrangements for the strategy. The IES is expected to cover Australian government policies and programs, implemented by government and non-government service delivery organisations, both mainstream organisations and ACCOs. It is not clear whether implementation falls outside of the strategy or is going to be an accompanying planning process. For example, how will the strategy be relevant to an ACCO implementing a program funded under the Indigenous Advancement Strategy?

Current practice is that frontline Aboriginal services and Aboriginal clients bear a considerable burden in relation to evaluation activities. They are often responsible for engagement of participants, identification and management of ethical risks, data collection and utilisation of evaluation findings, without necessarily having been involved in decisions to determine evaluation priorities and evaluation design. It is fundamental that as the IES is being finalised evaluation is seen in its totality – from the effort of the commissioning agency, to that of the implementing agency which is generally responsible for data collection, and the clients from whom data is collected.

Evaluation Principles

It would be helpful to distinguish between principles that underpin the policies and programs encapsulated by an evaluation strategy, and those principles that would best inform the approach to evaluation of those policies and programs.

All government programs should reflect stated principles for working with Aboriginal and Torres Strait Islander people. These principles should be the basis of a best practice framework for ensuring that programs deliver **what** is important to Aboriginal people. They include but are not limited to the following:

- Self determination
- Culturally informed approaches
- Accountability
- Strengths based approach and one that is centred on the aspirations of Aboriginal people
- Aboriginal-led collaboration and partnership
- Person centred
- Community engagement

- Equity

It is also critical that there are changes to evaluation practice to ensure that the benefits of evaluation to Aboriginal Australians are improved. The way evaluations are framed, designed and conducted should reflect the principles and preferences of Aboriginal and Torres Strait Islander people. At its most fundamental level, an Indigenous Evaluation Strategy should recognise and seek to avoid past bad practice in relation to evaluation and research with Aboriginal and Torres Strait Islanders. The Indigenous Evaluation Strategy needs to recognise the past and ongoing impacts of colonisation and racism. This includes previous experiences of research and evaluation that have been exploitative and disempowering. This also includes recognising the history of mistrust of government services.

VACCA endorses a principles-based framework which incorporates principles specific to Indigenous evaluation, such as those outlined in the frameworks cited by the Productivity Commission Indigenous Evaluation Inquiry Issues Paper. VACCA's own Evaluation Framework is principles-based and recognises the following principles:

- Human rights:
 - The right of self-determination for Aboriginal and Torres Strait Islanders
 - The rights of the child
 - Respect for all participants' rights, including rights to privacy and confidentiality
 - Respect for diversity
- Community benefit
 - Evaluation should benefit those people that the organisation supports
 - Do no harm – consideration and management of risk
 - Dissemination of evaluation findings – ensuring that we give back to participants
- Rigour
 - Justified
 - Honest
 - Objective

VACCA recommends that the IES does include principles which recognise the specificity of evaluation with Aboriginal and Torres Strait Islanders, and suggests inclusion of the following principles:

- The right to self-determination
- Genuine partnerships – with sharing of decision making
- Shared responsibility
- Capacity building
- Equity/a social justice or 'transformative' /de-colonising orientation
- Cultural competence
- Recognition of Aboriginal Cultural and Intellectual Property Rights
- Strength based including strengthening of culture
- Empowering
- Recognising diversity
- Inclusive
- Community ownership
- Respect for and protection of the rights of participants
- Utilisation and dissemination of results
- Justified and of benefit to the Community

To support the meaningful enactment of the principles, VACCA recommends that the IES elaborate how the principles are to be reflected in practice. For example, the right to self-determination requires that Aboriginal and Torres Strait Islander people should be making decisions about evaluation priorities, planning and implementation. As currently with the focus of government on evaluations, Aboriginal organisations are being inundated with external and government led research and evaluation from multiple government departments across a large number of programs they are funded to deliver. Government departments do not consult with each other or recognize the combined impact on Aboriginal organisations to support this evaluation work on the ground.

Evaluation governance mechanisms need to include Aboriginal representatives early in the planning phase and need to be conducted in a culturally safe manner. Respect for and protection of the rights of participants means that participant engagement strategies should be designed specifically for the participant group, with procedures in relation to consent that are targeted at the participant group and evaluations designed to allow for withdrawal of consent.

Evaluation Approaches and Methods for Indigenous Evaluation

Approaches and methods that are appropriate for policies and programs affecting Aboriginal and Torres Strait Islanders should be based on a number of factors, including the purpose of the evaluation, ensuring there is a credible, robust design, and committing to development and delivery of a culturally endorsed and owned form and approach.

Evaluation approaches fundamentally should support self-determination, and generally these are genuinely participatory and enable the capturing of Indigenous ways of knowing and doing. Fundamentally approaches should be negotiated with respective communities/stakeholders. The specific methods for a given evaluation should emerge out of these principles based on the purpose of the evaluation.

This does implicate what is deemed to be acceptable evidence. VACCA believes that *evidence* should be viewed in an inclusive manner. There is a tendency to privilege Western ways of knowing and doing in research and program evaluation in the form of 'evidence hierarchies'. This has tended to work against Aboriginal programs and policies in some cases as a form of bias which has resulted in there being limited research evidence to support Aboriginal programs and policies. For example, programs which are considered to be 'evidence-based' through random control trials typically have not included Aboriginal participants and may therefore not be applicable to Aboriginal contexts. Context is critical and a program that may have been found through an RCT to work in one context, may not have the same outcomes in another. If context is not considered, then predicted outcomes may not reflect the values of Aboriginal people, for example, they may not measure connection to culture or land. This is a discussion and debate which has not been adequately explored to date. There is an opportunity for the Productivity Commission to recognise and support the need for further development of recognition for Aboriginal ways of knowing and doing in relation to policy and program evaluation.

In terms of broad approaches to evaluation, VACCA supports those that are transformative and participatory. In terms of specific methods, VACCA believes that several qualitative methodologies, such as Most Significant Change, narrative, action research and case studies can serve as culturally appropriate and meaningful. VACCA is supportive of mixed methods approaches that may be inclusive of Western methods, provided these are endorsed in a highly collaborative design process and accompanied by other culturally meaningful methods.

Time is a big factor from beginning to end: Aboriginal communities value story telling/yarning, and this does take time and needs to be Aboriginal led.

Evaluation Practice in Australia

Current Practice

There is a welcome move nationally and at the state level to recognise the importance of use of evidence and evaluation to improving service delivery. However, current evaluation practice at a federal and state level in Australia has a strong focus on external evaluations of service delivery organisations, at the expense of engagement of Aboriginal organisations and communities in determining evaluation priorities, building organisational evaluation capability and enabling organization to use the data internally for program monitoring and quality improvement. These evaluations overwhelmingly serve the needs of the government funding agency in that they are designed to respond to funding agency drivers of evaluation. While this does not mean that external evaluations are not useful for service delivery agencies, it does mean that often what is being evaluated does not necessarily reflect the evaluation priorities or what is important to Aboriginal people and organisations.

This focus on external evaluation does not support self-determination, as evaluations are largely externally driven with limited opportunities for Aboriginal decision making in planning and implementing evaluations. External evaluations are frequently serving a number of different purposes – including evaluating policy reforms or pilots for funding agencies and evaluating impact of services on individuals. Determining what outcomes to measure and measures of success also may not be what Aboriginal organisations and communities know are important in service design, delivery and outcomes for their community, as these may be pre-determined, requiring Aboriginal organisations to collect data that is not measuring all the outcomes that are meaningful to their clients.

VACCA has recently been supported by federal and state government agencies to build internal systems and capability. This focus on building our capability supports self-determination, is more sustainable, ensures that evaluation priorities reflect those of Aboriginal communities and that approaches and methods are appropriate to the context.

Despite weaknesses with engagement of Aboriginal organisations and communities in decision making in relation to evaluation, Aboriginal organisations and community members are contributing significantly to evaluations. They are frequently providing data for evaluations as program participants and as staff of service delivery organisations. They are also frequently collecting data as frontline staff. Implementing agencies are not often funded to collect data required for external evaluations. Aboriginal agencies have also not had the information management systems that allow for easy access to program data, limiting our ability to draw on data for quality improvement.

A common evaluation practice is one in which funding agencies contract external evaluators to evaluate a grant scheme or programming type implemented across different Aboriginal organisations. While there are valuable lessons to be learned by understanding implementation in different contexts, the design of the evaluations appears often not to consider differences in organisational evaluation capability. In some situations, there has been little or no consultation with implementing agencies in the decision to conduct the evaluation or identify suitable evaluators. Apart from not supporting self-determination, this way of commissioning and conducting evaluations is not well targeted because it is not based on an agreed need for support and evaluation.

Evaluation practices also often reflect timelines that are set by the funding agency and do not necessarily support the implementing agency. The timelines also do not recognise the time it takes to implement new programs impacting on the quality of the data and outcomes that are able to be collected so early in the implementation phase.

Evaluation Priorities

Current Practice

State and federal government agencies are generally not engaging Aboriginal organisations delivering services in decisions regarding evaluation priorities. Decisions regarding priorities are frequently made solely by government agencies based on factors that may or may not be of importance to the service delivery agency or the communities receiving services. Often these decisions are made regarding government priorities in relation to mainstream service delivery, with an Aboriginal cohort or evaluation component added to the evaluation.

The lack of engagement of Aboriginal organisations and communities in determining priorities has several impacts, including evaluations not focusing on issues of enough importance to Aboriginal communities, and data collection burden on Aboriginal organisations.

What we recommend

- That government agencies engage with Aboriginal organisations and community representatives to determine evaluation priorities. This will enable better processes to draw out those programs and issues which are of priority to Aboriginal organisations and communities.
- That decisions about evaluation priorities consider the significance of the program or policy reform, the size of the program, including numbers of clients and program budget.
- That decisions about evaluation priorities consider the usefulness of the evaluation – in particular whether it will address research gaps and/or contribute to building an evidence base for Aboriginal programs
- That decisions regarding priorities recognise other research and evaluation that is being conducted either internally by Aboriginal agencies or funded through other sources and current evaluation demands on Aboriginal agencies.

Planning and resourcing Indigenous Evaluations

Current practice

Planning for evaluation has generally not been done by government funding agencies during the design and development of programs. Common practice has been that programs commence implementation with planning for an evaluation following, and requirements from funding agencies for participation in evaluation after the program has begun and often after the evaluation has been designed and the external evaluator engaged. Recognising the importance of data collection and the critical role of practitioners in contributing to evaluation, if evaluation data collection is not planned at the start of a program's inception, there can be resistance to data collection, contamination of data and other implementation challenges. This practice is starting to shift and VACCA welcomes this change.

VACCA's Evaluation Framework recognises the overlapping stages of evaluation as planning (for programs and evaluation), implementation (of programs and evaluation), evaluate and learn, and adapt. Evaluation should be embedded into program design and implementation. In practical terms this means that as part of program design, there is a clear articulation of program logics and theories, identification of measures of success and determination of what data needs to be collected by whom and when.

Evaluation has generally not been included as part of program funding, but this is also starting to be recognised, although it seems to depend upon the funding agency's submission process and is still often going to external evaluators rather than Aboriginal agencies. There is a growing recognition from funding agencies that program's require evaluation frameworks and that evaluation should be funded with program budgets.

What we recommend

Planning:

- Evaluation planning should be consistently part of funding submissions
- Evaluation needs to be part of service agreement and contract negotiations between funding agencies and services organisations
- Aboriginal organisations need to be decision makers about who will manage evaluations and recruitment of evaluators
- Planning should engage Aboriginal organisations and communities as decision makers in processes which enable their participation
- Inception planning should include planning for the evaluation

Resourcing:

- Service delivery organisations should be resourced to conduct evaluation activities
- That funding agencies recognise and support the building of internal evaluation systems and capability within service delivery organisations
- That funding agencies liaise with service delivery organisations about external evaluations so that there is good coordination and alignment of data collection
- That evaluation be resourced in project budgets and Aboriginal organisations supported to lead and manage evaluations (internally or externally)
- Recognition that each service delivery agency is at a different place in relation to their own capability and work with them where they are;
- That government funding agencies ask Aboriginal service delivery organisations what they need to build their evaluation capability and support their efforts to build evaluation systems and capability.

Indigenous Governance of evaluations

Current practice

There is growing recognition from government funding agencies of the need for Indigenous Governance, although practice remains that there is often a lack of Indigenous Governance. Decisions on what to evaluate and how to evaluate are often made without Aboriginal people and organisations. Consultation mechanisms and timelines are often not conducive to participation of Aboriginal people and organisations. Government agencies rely on inviting agencies to governance meetings and progress with decisions whether Aboriginal agencies are well represented or not. This approach does not recognize the size of Aboriginal organisations and their inability to meet the consultation demands. Governments also rely on Aboriginal agencies who participate to represent the views of all Aboriginal agencies which is not always accurate or appropriate.

What we recommend

- Through existing or new partnership mechanisms Aboriginal people and communities should be engaged in decisions about priorities for evaluation
- Aboriginal organisations and communities should be engaged in decisions about the design and implementation of evaluations through mechanisms which are culturally appropriate, and which recognise the consultation burden which many organisations and community leaders face.
- Government agencies need to proactively seek out and visit Aboriginal agencies and communities to gain their input directly into evaluations that impact on them.

Evaluation Data

VACCA is building evaluation systems that recognise Indigenous Data sovereignty - the right of Indigenous people to develop, collect, own and use their own data. This is fundamental to evaluation given it is a process in which decisions are made about what to evaluate, how to evaluate, the collection and use of data. Through building our own client information and case management database, VACCA is determining our own outcomes and measures for success. We are identifying what data we need to collect to measure our outcomes and how we will collect the data. We will retain ownership of that data and be able to draw on it for quality improvement, innovation and accountability to stakeholders.

For example, external evaluators have not regularly recognized data ownership or shared data with agencies involved in evaluations. Given time delays in data analysis and limits of data provided within final evaluation reports, this impacts on agencies' ability to use evaluation learnings and implement quality improvements through the evaluation process.

What we recommend

- The Indigenous Evaluation Strategy acknowledges the principles of Indigenous Data Sovereignty, in particular that Aboriginal people should have control over their own data
- That Aboriginal organisations are funded to develop their own information management systems
- That external evaluations seek to align with Aboriginal organisations information management systems so that there is greater recognition of Indigenous data sovereignty, reduced additional burden of data collection for external evaluations and greater utility of data collected by Aboriginal organisations.

Evaluation Transparency

Current Practice

Practice in relation to evaluation transparency is mixed, with some government agency external evaluation reports published and/or made available to implementing agencies, but in some cases findings not made available. This undermines a key aim of evaluation – to enable those designing and implementing services to continuously improve service delivery.

A number of evaluation guidelines cited in the Indigenous Evaluation Strategy Issues Paper require evaluation to benefit the community and for data that is collected to be used.

What we recommend

- Evaluation results should be shared with participants – this includes the Aboriginal organisations and staff and clients
- Evaluation findings should be used. Organisations need to be able to address issues identified in evaluations to improve the quality of services
- Evaluation findings should be supporting the development of an overall evidence-base of Aboriginal programs and policies. This will not happen if evaluation findings are not published or made available to Aboriginal organisations.

Evaluation Culture, Capability and Capacity

Current practice

There is an assumption that Aboriginal organisations do not have the culture, capability or capacity to design, plan and implement evaluations. Aboriginal agencies are not asked about their capability or capacity and

funding for evaluation work is often automatically provided to mainstream services, consultants or universities which does not reflect the government's commitment to self-determination.

There is limited focus on building evaluation culture, capability and capacity within service delivery organisations. This is partly because it has not been prioritised but also because a focus on external evaluation by funding agencies distorts the focus within service delivery organisations. Organisations need to be resourced to develop evaluation capability, including negotiating agreements about external evaluation priorities that may impact on efforts to build internal systems and capability.

What we recommend

- Funding agencies should consult with Aboriginal service delivery organisations in determining evaluation priorities, the scheduling of evaluations and their current capabilities
- Aboriginal organisations should be resourced to build evaluation capability
- Evaluations should support capacity building within Aboriginal organisations through meaningful engagement in planning and implementation.

Evaluation ethics

In relation to evaluation ethics, VACCA supports the recent analysis of the University of Melbourne (unpublished, 2019):

{R}esearch ethics traditionally involves the relationship between researchers and the researched. The NHMRC guidelines [Ethical conduct in research with Aboriginal and Torres Strait Islander Peoples and communities: Guidelines for researchers and stakeholders 2018](#) (14) and [Keeping research on track II 2018](#) (15) build on this by including Aboriginal communities as entities in the research ethics process. However, these guidelines still do not fully encapsulate the ethical complexity of evaluation for two main reasons. First, in evaluation the roles of the researcher as conceptualised in research ethics are split between commissioners, service providers and evaluators. This means that conventional ethics do not consider the obligations of all parties, only those of the evaluator, with important ethical obligations often not fully met. Secondly, research ethics only considers research ethics on a project by project basis. It does not consider broader implications of research or evaluative activity to equity and benefit in health, wellbeing and safety. For example, in the timeframe of a project, the extent to which the evaluation capacity of Aboriginal people can be developed is limited. True capacity development requires institutional structures to support the development of Aboriginal evaluators throughout their careers. This in turn requires a conceptualisation of ethical obligations that extends beyond a particular project.

Conclusion

VACCA is committed to building internal capability and capacity to lead monitoring and evaluation of the services that we provide to ensure they are effective and support the community we serve.

We are very interested in the outcome of this Productivity Commission Inquiry into an Australian Government Indigenous Evaluation Strategy. We note that you will also be completing consultations with agencies and we would welcome involvement in one of these consultations to expand on the information that we have provided in this submission.