



National Aboriginal and Torres Strait Islander Health Standing Committee

TO	Productivity Commission
FROM	NATSIHSC
RE	Draft Indigenous Evaluation Strategy
DATE	August 2020

Thank you for the opportunity to provide feedback on the draft Indigenous Evaluation Strategy.

NATSIHSC members have provided a range of differing views and these are provided below:

General comments:

NATSIHSC welcomes the proposed strategy towards establishing a streamlined approach to evaluating policy and programs to align with the perspectives, knowledge, and priorities of Aboriginal and Torres Strait Islander people where appropriate and possible. In particular, NATSIHSC offers support for:

- The guiding principles of the Strategy that evaluation must be credible, useful, ethical, and transparent;
- The commitment to publish all evaluation reports, respecting the need to provide feedback to those consulted;
- Providing plain language evaluation report summaries;
- Establishing a clearinghouse of resources to enable research translation and build an accessible knowledge base;
- The recognition for ethics and data sovereignty in research and evaluation;
- Every evaluation having an action plan to address the results of evaluation;
- Centralised oversight and decentralised, independent evaluation;
- Promoting a whole-of-government approach to priority setting and evaluation;
- Setting evaluation priorities and publishing Three Year Evaluation Forward Work Plans;
- The practical questions offered to guide evaluators, which enables a reflective approach to policy, program, and evaluation design;
- Alignment with current approaches to First Nations health evaluation; and
- Improving accountability for First Nations health at the national level.

Specific comments:

- Suggest that the title needs to be amended to ensure it is clear and accurately reflects the subject – for example “Evaluation of Aboriginal and Torres Strait Islander Policies, Programs and Strategies” This is not an evaluation of Indigenous people, as the title currently implies.
- Suggest the document could be streamlined and shortened, keeping only relevant information and avoiding repetition. By attempting to include everything key messages are being obscured and lose focus. The key takeaways from this Strategy could be summarised across four pages:

- Guiding Principles (listed not explored over two pages per principle)
 - Priority Policy Areas
 - Actions (again listed and summarised)
 - Implementation Timeline
- The guiding principles, as previously advised by NATSIHSC in 2019 (Attachment 1), require the cultural determinants to be referenced as a foundation or building block to ensure “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”.
- Regarding terminology when referring to Aboriginal and Torres Strait Islander people:
 - Consider removing the word “Indigenous” and replacing with “Aboriginal and Torres Strait Islander” where possible within the documents – including the titles of the proposed agencies, such as the Indigenous Evaluation Council – as some Aboriginal and Torres Strait Islander people do not agree with the use of this term;
 - Suggestion to remove “Australians” when referring to Aboriginal and Torres Strait Islander people as some feel this places Aboriginal and Torres Strait Islander people as a sub-group of Australia even though they were here before colonisation; and
 - See Queensland Health’s Protocols for use of ‘Aboriginal’ and ‘Torres Strait Islander’ for more information.
- Suggestion to strengthen the importance of partnerships with Aboriginal and Torres Strait Islander people across the documents. For example, in some sections it says partnership is “also” important, whereas this should be a central action (to the greatest extent practicable) when working through all stages of the policy cycle.
- Recommendation to remove “gap” language where possible when referring to the health and wellbeing of Aboriginal and Torres Strait Islander people due to the deficit-based nature of the word and instead refer to equity/inequity.
- Suggest recognising the unique and diverse needs of Aboriginal and Torres Strait Islander peoples, and avoiding a one-size fits all approach. Suggestion to state more explicitly that evaluation processes need to be broad and catered to local level cultural customs, norms, and needs where possible as this highlights for the reader that not all Aboriginal and Torres Strait Islander people and communities will have the same cultural needs. The most appropriate solutions, policies, and programs should be tailored and adaptable for specific environments and settings.
- Under action 4, consider embedding specific training on the evaluation framework for policy and program officers which incorporates cultural capability training.

Identification of evaluation priorities

- Action 1 of the draft Strategy states that “[Australian Government] Agencies should systematically identify evaluation priorities and publish evaluation forward work plans” (pg24) in line with proposed interim government-wide evaluation priorities outlined in the draft Strategy (p.22)
- Response: we would welcome more detail and consultation about the approach to evaluation priority setting where Australian Government Aboriginal and Torres Strait Islander policies and programs intersect with State/Territory policies and programs via funding arrangements.

Monitoring compliance with the Evaluation Strategy:

- Action 11 of the draft Strategy states that “[Australian Government] Agencies” performance against the draft Strategy should be monitored by the Office of Policy Evaluation” (p.29).
- Response: would welcome more detail and consultation about the proposed criteria for assessing compliance with the draft Strategy, most notably any requirements at the

jurisdictional level where State/Territory Aboriginal and Torres Strait Islander policies and programs intersect with Australian Government policies and programs via funding arrangements.

Enhancing the use of evaluations

- Actions 7-10 note that all evaluation reports should be published, including in an accessible format, along with establishment of a clearing house and the requirement for agencies to publish a response to evaluation findings
- Response: we support the focus on results dissemination and translation. A further strategy to enhance Aboriginal and Torres Strait Islander ownership of evaluation findings and recommendations, is that Aboriginal and Torres Strait Islander stakeholders are actively engaged in developing evaluation findings and recommendations. This could come through more prominently in the draft Strategy.

National Agreement on Closing the Gap

- Suggestion to build upon the national consultations for the new National Agreement on Closing the Gap (the Agreement). The NSW consultations led by the NSW Coalition of Aboriginal Peaks in late 2019 confirm how important it is that Government listens to what the community holds as priorities, ensures transparency in investment in mainstream and Sector services and is held accountable for its performance.
- Suggestion that the evaluation priorities align with the reform directions and targets of the Agreement, including healthy birthweight, violence against Aboriginal and Torres Strait Islander women and children, suicide of Aboriginal and Torres Strait Islander people and Close the Gap in life expectancy.
- Future evaluation efforts must be supported by data development in domains including commitment to partnership development and other reforms re-iterated in the National Agreement, though these may be challenging to collect. The Agreement also recognises the importance of local solutions, meaning that evaluation needs to be supported by data projects which enable such assessment at local level.
- Importantly, the consultations again highlight need for Government to communicate clearly and simply for community audiences across all areas of Closing the Gap, including the effectiveness of services to meet local need.

Jade Daylight-Baker
NATSIHSC Chair
August 2020