

Empowered Communities

Response to the Productivity Commission's
Draft Indigenous Evaluation Strategy



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V 2.0

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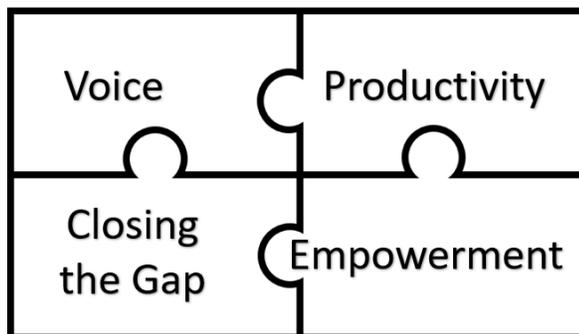
Introduction

Empowered Communities' Leaders welcome the ongoing work of the Productivity Commission in developing an Indigenous Evaluation Strategy (the Strategy) and the opportunity to provide further comment on this important work directed, ultimately, at improving the lives of Aboriginal and Torres Strait Islander people. We acknowledge the extent and detail of the draft Strategy and appreciate the opportunities that we have had to meet with you.

In the 12 months since Empowered Communities first submission (August 2019) there have been some major policy developments in the Indigenous affairs landscape including significant progress with the co-design work on the Voice to parliament, local and regional partnerships, and the National Closing the Gap Agreement. While the Voice co-design work is yet to be finalised, it will be crucial that it, the implementation of the recently released National Agreement on Closing the Gap and your work be aligned so that the whole Indigenous affairs system is working together to close the gap on Indigenous disparity.

In the emerging landscape, we believe there are four key policy areas requiring action. These are: Recognition of Indigenous Australians Voices, Empowerment through structural reforms and Indigenous agency, improving the Productivity of investment and Closing the Gap on Indigenous disparity. See Figure 1 below.

Figure 1: The four piece jigsaw of Indigenous Affairs



Evaluation, monitoring and adaptation, based on a learn as you go approach, should be a fundamental part of, and support in, the implementation of each of those policy areas.

Empowered Communities from the start has set out to implement three of those policy areas, Empowerment, Productivity and Closing the Gap in our local regions and communities. This was first discussed in our Design Report (2015), where we also proposed a specific governance framework because we believed that success would require the right, strong governance arrangements. We proposed establishment in legislation of an Indigenous Policy Productivity Council (IPPC) to work alongside Indigenous regions, communities and our partnering government agencies that linked the essential elements of greater productivity and monitoring, evaluation, and adaptation. The IPPC was not supported by the government at the time. We

have not backed away from making the argument to government that all of the work that we have done on the ground over the last five years and going forward, will only get us so far without the necessary structural reform through legislation to scaffold our partnership model, and without a statutory body that oversees Indigenous and government partnerships to ensure each partner follows through on reform commitments.

Your Strategy proposes establishment of a statutory authority, the Office of Indigenous Policy Evaluation. This is only part of the solution. There must be a direct productivity link that addresses the need to get much better value and targeting from existing resources as a first step. The Productivity Commission should make stronger recommendations to ensure the necessary productivity and empowerment reforms, as well as accountability and transparency are in place through the Indigenous Evaluation Strategy and embedded across government agencies as business as usual.

This submission argues that there are some key components of the Indigenous Evaluation Strategy that we consider must be strengthened if real progress is going to be achieved on the ground in communities. These are:

- 1) The first principle of “*Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledge*” is positive but not sufficient, and should include empowerment and Indigenous agency as core to the ‘centring’ principle,
- 2) Be more explicit about the Strategy’s governance arrangements to give it the best chance of success,
- 3) Position the Strategy in relation to any future Indigenous Australians National Voice, including Local and Regional Partnerships and shared decision making on the ground about policies, programs, and funding to close the gap, and
- 4) Empowerment of Indigenous people through the evaluation planning, monitoring, reviewing and adapting the Strategy.

1. Strengthening the Overarching Principle - Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges

Strong and simple underpinning principles are essential to implement the Strategy across the Commonwealth government. Whilst the Strategy articulates what “high quality practice looks like” (p8) and suggests some flexibility for agencies to tailor to their specific circumstances, the principle of “Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges” (p8) is not sufficient as stated. To address this, we suggest the insertion of “Empowerment and agency of Aboriginal and Torres Strait Islander People” within this principle. This highlights the role of Indigenous communities as partners exercising agency and shared decision-making in relation to policy and program evaluation, not as parties to evaluations and as evaluation subjects.

In terms of the second tier' principles of 'credible', 'useful', 'ethical' and 'transparent' as stand-alone principles, these are useful in framing the wider strategy but embedding a greater appreciation of empowering Indigenous people under the strategy as proactive partners and consumers of services will more strongly frame these principles and give real strength to the "doing with" rather than "doing to" Aboriginal and Torres Strait Islander people that the current description suggests.

2. Establishing the right governance structure

Many lessons have been learned from nearly five years of Empowered Communities implementation across ten regions. In our submission to the Productivity Commission in August 2019, one of the issues that we specifically highlighted was the importance of the right governance structure to deliver this important piece of work. In our view, the most effective Strategy would be embedded in legislation and drive an adaptive 'learn as you go' approach to program and service design, investment and evaluation that improves outcomes and productivity, as well as centring and empowering Aboriginal people in design, decision-making and delivery at all points along the way.

If an OIPE is established with functions as proposed it will be crucial that it sits within the broader Productivity Commission. This would both provide a productivity link and better enable the power and influence that it will require to do its job effectively. It will need legislative 'teeth' to harness all relevant parties, governments, funded service providers and others, and ensure they follow through on commitments under the Strategy. Establishment in another, even relatively arm's length, government agency, without its own legislative base and direct productivity link would lessen its strength to act as it will need to, to support Indigenous people and government to close the gap.

We would strongly support Indigenous people being involved in any formal governance structure for the Strategy - particularly those from local and regional areas who have very detailed knowledge and experience of the actual impact of policies and services on Indigenous individuals and families on the ground.

3. Monitoring and Reviewing the Strategy

Constant monitoring and review is crucial as highlighted in our Design Report and in Empowered Communities implementation to date. Based on our learning we would highlight the importance of the following aspects for detailed consideration. This includes:

- Embedding a change like this across the APS is a massive undertaking and governance 'with teeth' is essential, and
- Building Indigenous evaluation capability including skills in agencies for co-designing and implementation of culturally proficient evaluations in partnership with Indigenous communities.

Additionally, this means that approaches such as the development of a universal indicator set may be premature given that there is a need to build capability to effectively design and use indicators. That is, the approach may be too general and increase risks of generating outputs that misrepresent what impacts are being achieved if used too soon.

Supporting agencies to make these changes will be essential. They will require assistance as well as monitoring. The role of enabler will shift to the OIPE, but it will also need to be able to ensure 'compliance'. Without this, there is a risk that agencies will default to out-dated theories about evaluator independence, randomised trials and emphasising participatory methods rather than working in partnership with Indigenous communities to co-design; and this approach is at the heart of how Indigenous evaluation should be undertaken by the Commonwealth.

3.1 Response to Government – Wide Evaluation Priorities

The identification of government wide priority policy evaluation areas linked to Closing the Gap is essential, as is strengthening the linkages between government wide evaluation priorities and regional place-based evaluation, particularly in informing place-based adaptation. Closing the gap at the regional and local levels, and setting priorities at those levels, should not be compromised by national top down targets and approaches that bear no relationship to the work and co-design of regional and local outcomes and activities. Local people must be able to set their own local priorities to close the gap in the communities and regions where they live, and any government wide set of evaluation priorities should accommodate this.

4. Conclusion

In developing this submission, Empowered Communities Leaders canvassed broad views from across our network. The key issues that we want to highlight are outlined above but there is some additional feedback that could be provided to you should you be interested. Much of that is more detailed input about implementation rather than the strategic matters addressed above. We would be very happy to provide that to you.

We would welcome the opportunity to work further with the Commission as it further formulates the Indigenous Evaluation Strategy and develops further detail around the governance arrangements and the proposed *Office of Indigenous Policy Evaluation and Indigenous Evaluation Council*. We are also happy to discuss in more detail the proposed *Guide to the Indigenous Evaluation Strategy*.