

## Submission

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### Indigenous Evaluation Strategy – Productivity Commission Issues Paper

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23 August 2019

The Aboriginal Health Council of Western Australia (AHCWA) is the peak body for 23 Aboriginal Community Controlled Health Services (ACCHSs) providing primary health services across diverse regional, rural and remote locations in Western Australia. AHCWA exists to support and act on behalf of our 23 Member ACCHSs, and our principal vision is for Aboriginal people in Western Australia to enjoy the same level of health and wellbeing as all Western Australians.

AHCWA and its member ACCHSs support the Commonwealth Government's initiative to request the Productivity Commission to develop an Indigenous Evaluation Strategy.

Collectively, ACCHSs are the main providers of comprehensive primary health care for Aboriginal people and their communities. They plan, develop and deliver services *by* Aboriginal people, *for* Aboriginal people but their services are consistently held to account by measures established by external, mainstream commissioning bodies. AHCWA strongly supports ACCHSs being the preferred providers of comprehensive primary health care services and programs for Aboriginal people and their communities, and is very concerned about the services and programs commissioned to deliver services for Aboriginal people by mainstream organisations. Therefore, it is essential that the Productivity Commission establishes an evaluation framework which requires all services and programs to demonstrate outcomes that are positive, meaningful and culturally appropriate for Aboriginal people and their communities.

It is time that service delivery for Aboriginal people and their communities is held to the highest account. The establishment of an Indigenous Evaluation Strategy has the potential to set the standard for how governments, and by extension their commissioning agencies, understand and approach Aboriginal services and program design and delivery in the future.

This submission responds to the Indigenous Evaluation Strategy Issues Paper by outlining suggested principles to underpin the strategy, and its resulting framework. Some principles have already been identified by the Productivity Commission, while others are reflective of the priorities and interests of the WA ACCHSs sector.

#### Principles

- **Empowerment and self-determination for Aboriginal people**
  - AHCWA welcomes the Productivity Commission's acknowledgement of the right of Aboriginal people for self-determination.
  - Self-determination is achieved when Aboriginal people and their communities set the program agenda, and when government agencies and commissioning bodies genuinely engage and collaborate with Aboriginal people and their communities to identify issues and priorities.

- **Cultural security**

- Any evaluation framework for Aboriginal services or programs must be culturally secure and would include, but not be limited to:
  - Genuine engagement and collaboration with Aboriginal people in the development and delivery of the framework;
  - Engagement of Aboriginal expertise, including Elders, in assessing the outcomes of programs;
  - Demonstrated cultural awareness, safety, security and competence by non-Aboriginal evaluators; and
  - The provision of accurate feedback to Aboriginal service and program participants.
- AHCWA also recommends that cultural safety training is mandated for organisations delivering services to and with Aboriginal people, and that compliance with this is measured under the framework.

- **Commitment to co-design**

- The framework should highlight and support services and programs that deliver outcomes *with* Aboriginal people and their communities.
- Organisations proactively collaborating with Aboriginal people to co-design and co-produce programs must be validated and promoted, and should inform future program funding and development.

- **Commissioning for prevention and early intervention**

- ACCHSs deliver comprehensive primary health care in alignment with a holistic Model of Care which is committed to prevention and early intervention.
- Given this focus, programs for Aboriginal people and their communities must be evaluated in relation to how they deliver outcomes in prevention and early intervention.

- **Evaluation based on Aboriginal measures of success, not mainstream norms**

- An Indigenous evaluation framework must be sensitive to outcomes which are uniquely relevant for Aboriginal people. While the framework will be broad, it must be nuanced to reflect different outcome priority areas for Aboriginal people including, health, justice, housing, education and employment. It must also be sensitive to outcomes in different contexts, for example, urban outcomes versus rural and remote.
- The framework must enable the application of flexibility in how Aboriginal services and programs are measured to obtain more accurate, meaningful and contextual analysis.
- The focus of the framework must be on outcomes, not outputs, and success must not be tethered to mainstream norms.
- AHCWA supports the Productivity Commission's recognition of the impacts of intergenerational trauma, systemic racism, discrimination, disadvantage and disempowerment on outcomes for Aboriginal people. These issues must be considered in the development *and* application of the framework.

- **Aboriginal approaches to evaluation**

- AHCWA supports the Productivity Commission's recognition of Aboriginal people as 'commissioners, doers and users of evaluation' (Productivity Commission 2019, p. 21).

- The framework should incorporate mixed approaches and methods including quantitative and qualitative analysis of programs.
- AHCWA supports the use of Aboriginal-specific data collection methods including knowledge sharing, yarning, and listening as outlined in the Issues Paper (Productivity Commission 2019, p. 15).

NOTE: The Issues Paper references specific Aboriginal words 'ganma' for knowledge sharing, and 'dadirri' for listening. AHCWA strongly suggests the Productivity Commission reconsider the inclusion of terms specific to discreet language communities of Aboriginal people in its documents to ensure cultural security and inclusiveness for all.

- AHCWA also supports more informal forms of evaluation undertaken by ACCHS, for example, qualitative measurement of social and emotional wellbeing and environmental health programs.

- **Evaluation informing service commissioning and design**

- AHCWA supports the Productivity Commission's position that evaluation is an ongoing, iterative process which starts at the project planning phase, and continues through to final review. The Issues Paper states that 'better and more systematic policy evaluation would lead to better policy planning, design, implementation, and greater avoidance of duplication. It would provide the basis for successful policies and programs to be expanded, and less successful programs curtailed' (Productivity Commission 2019, p. 7).

- **Evaluation without agendas**

- Independence and objectivity is essential for accurate information to be gathered through program evaluation.
- AHCWA recommends the framework should promote fair and balanced assessments in alignment with expected program outcomes. This could be achieved by engaging independent evaluators to complete reviews rather than commissioning bodies who may interpret outcomes in a way that supports a particular position or interest.
- Any research or data collection involving Aboriginal people be subjected to rigorous ethics approvals processes. The ACCHS sector emphasises the importance of cultural safety and adhering to cultural protocols in the way data is collected, used and represented. In WA, any health and wellbeing data being collected about Aboriginal people for the purposes of research must go through the WA Aboriginal Health Ethics Committee (WAAHEC) approvals process.

- **Feedback**

- Accurate feedback must be provided to Aboriginal people and their communities involved in programs under evaluation. This is essential for transparency and trust building, and demonstrates respect for Aboriginal people involved.
- However, as detailed in the Issues Paper (Productivity Commission 2019, p. 35), care is required in the public release of information about Aboriginal programs to ensure privacy, confidentiality and the protection of identifiable information about Aboriginal people and communities.

- **Meaningful and responsible use of data**

- In developing the framework, the Productivity Commission must ensure data being collected in evaluation is relevant, accurate and contextual. For example, as previously mentioned, a program being delivered across WA is likely to produce different outcomes across urban, rural and remote settings.
  - As discussed in the Issues Paper, it is also important that the framework doesn't increase the burden of data collection for Aboriginal services and programs. ACCHSs already provide multiple data sets to different commissioning bodies, therefore, any future evaluation framework should be considerate of this.
  - AHCWA suggests that the evaluation framework provides a unique opportunity to shift the dialogue on Aboriginal health from a deficit to a strengths-based model. Too often, data demonstrating Aboriginal health and wellbeing focus on deficits and limitations when, instead, data should be reframed to reflect achievements in health outcomes. This could be achieved through consulting with ACCHSs on how data is interpreted, presented and shared.
  - The security of Aboriginal health and wellbeing data is a very high priority for ACCHSs across Western Australia. Best-practice collection and ethical sharing of data, the responsible use of data by other agencies, integrity in data reporting and the acknowledgement of data sovereignty are key principles, strongly protected by ACCHSs, Aboriginal people and their communities. The evaluation framework should recognise the data sovereignty of Aboriginal people and their communities, and should not be allow data to be released without their endorsement.
- **Compliance**
    - AHCWA supports that programs should comply with the framework and engagement in evaluation must be a condition for Aboriginal service and program commissioning.
    - AHCWA supports the Productivity Commission's position that the Indigenous Evaluation Strategy be subject to ongoing review to ensure that it remains fit for purpose.
  - **A sustainable evaluation framework**
    - AHCWA recognises that the Productivity Commission is in the early stages of developing the Indigenous Evaluation Strategy. A key consideration from the outset will be to ensure the strategy clearly defines how evaluation is to be sustainably resourced and funded.
    - Evaluation of a program should be prioritised in the commissioning phase and resources must not be channelled into program delivery at the expense of evaluation.

Reference: Productivity Commission 2019, *Indigenous Evaluation Strategy Issues Paper*, Australian Government Productivity Commission, Canberra.