



First Peoples
Disability Network
Australia

FIRST PEOPLES DISABILITY NETWORK (Australia)

**Statement to the Productivity Commission on the Indigenous Evaluation
Strategy Issues Paper**

August 2019

STATEMENT TO THE PRODUCTIVITY COMMISSION

First Peoples Disability Network (Australia) accepts an invitation from the Productivity Commission by making the following comments on the Issues Paper on the Indigenous Evaluation Strategy, dated June 2019:

1. SOVEREIGN RIGHTS TO SELF-DETERMINISATION

The First Peoples Disability Network (Australia) ('FPDN') are dual sovereign rights holders to self-determination for the Aboriginal and Torres Strait Islander disability community under the *United Nations Declaration on the Rights of Indigenous Peoples* and participatory inclusion under the *Convention on the Rights of Persons with Disability*. According to the principle of self-determination, we have chosen to respond with a structure that prioritises our issues, rather than necessarily conform to the structure outlined in the Issues Paper.

2. APPOINTMENT OF AN INDIGENOUS COMMISSIONER

First and foremost, we respect and support the appointment of Mr Romlie Mokak as the first Indigenous Productivity Commissioner. We believe that if accompanied with the requisite cultural change that is needed within government agencies in how they engage with Aboriginal and Torres Strait Islander people and organisations, then this appointment may be act as a catalyst for lasting change.

3. WHO IS THE EVALUATION STRATEGY INTENDED TO BENEFIT?

Our initial observation of the Issues Paper is that it is in a style, tone and structure that is written by government for government. The discussion questions are framed to infer that the evaluation is an activity that is done independently *about* Aboriginal and Torres Strait Islander people¹, as opposed to a collaborative exercise that is done with community to produce a shared understanding of issues problems and solutions. The Issues Paper is further characterised by a high self-citation rate of other government reports, and by contrast, the referenced contribution of Aboriginal and Torres Strait Islander community organisations and researchers is negligible.

This causes us to ask who is the evaluation strategy intended to benefit? If this strategy is exclusively for government, and we must conform to government dominated thinking to have any influence, then as an Aboriginal and Torres Strait Islander community organisation we expect that we will have little to offer.

¹ See for example: *What objectives should a strategy for evaluating policies and programs affecting Aboriginal and Torres Strait Islander people seek to achieve?*

If on the other hand, the purpose of the evaluation strategy is intended as a broader contribution to improving the quality and effect of services that are provided by and for Aboriginal and Torres Strait Islander people, as is inferred by the reference to the *United Nations Declaration of Indigenous Peoples*, then the Indigenous evaluation strategy must provide greater weight to Indigenous knowledges and the community-based processes that generate it. This in turn requires a cultural shift within government agencies on how the knowledge of Aboriginal and Torres Strait Islander people and their organisations is recognised.

4. RECOGNISING INDIGENOUS KNOWLEDGE AND METHODOLOGIES IN EVALUATION

As noted above, the Issues Paper heavily weights government reports as the authority on Indigenous evaluation, whereas traces of Indigenous influence are hard to come by. In a number of cases, the Issues Paper preferences the citation of non-Indigenous scholars, even when Aboriginal and Torres Strait Islander community knowledge is a viable and more appropriate alternative.

One example is in the section on the National Disability Strategy (p. 9-10) that first references a Australian Government report that is obscure and not utilised within the sector; then cites research from a collective of disability researchers, which whilst highly respected in the field of disability are not Indigenous and cannot speak for the First People with disability as a self-determining community. The cited researchers themselves point to the benefit of Indigenous knowledge in design and implementation:

“specific barriers faced by Aboriginal and Torres Strait Islander people needed to be better addressed in the policy design and implementation stages (including through inclusion of Aboriginal and Torres Strait Islander community representatives in these processes” (Davy et al, 2018; at p11.).

By contrast, the Issues Paper is completely silent on the contribution that the First Peoples disability community has already made in highlighting and addressing these barriers, with examples from our own work at FPDN², and as profiled by the Lowitja Institute for Aboriginal and Torres Strait Islander Health Research³. The pattern that is repeated throughout the Issues Paper is reflective of the institutionalised bias in the management of Indigenous affairs more generally: first and foremost government agencies and their reports are acknowledged; then comes non-Indigenous approaches; then, if at all, comes the contribution of Aboriginal and Torres Strait Islander communities and researchers.

The effect of the hierarchy is that it reduces Aboriginal and Torres Strait Islander community knowledges as a *perspective* to what is established as a dominant westernised approach to policy research and program evaluation. It becomes in practice discretionary to the end

² See for example various FPDN publications, at: <https://fpdn.org.au/community-driven-research/>

³ See for example Lowitja Institute of Aboriginal and Torres Strait Islander Health Research, ‘Understanding disability through the lens of Aboriginal and Torres Strait Islander people workshop’, at <https://www.lowitja.org.au/page/research/research-roundtable/understanding-disability-workshop>

product, a form of knowledge that can be considered if useful, but can also be vetoed anonymously without recourse⁴ if it doesn't fit with the institutionalised way of thinking. Even with the best sentiments that Indigenous engagement is not a 'tick and flick' exercise (refer page 4), what Aboriginal and Torres Strait Islander communities bring to the engagement is constantly chipped away by the institutionalised practices that drive thinking towards "this is how we do it, because this is how we've always done it".

If the Indigenous evaluation strategy aspires to have greater connectivity with the *United Nations Declaration in the Rights of Indigenous Peoples* (p.3-4), then any technical review of Indigenous evaluation practices and processes must be accompanied by a cultural shift within government agencies that affords greater respect for the contribution of Aboriginal and Torres Strait Islander knowledge and methods. Whilst the initial Issues Paper has failed to grasp this opportunity, we are nonetheless optimistic that this required cultural shift can be initiated through future revisions of the evaluation strategy.

5. ROAD-TESTING THE ASSUMPTIONS OF EVALUATION METHODOLOGIES

Whereas there is a constant battle to prove the legitimacy of Aboriginal and Torres Strait Islander community knowledge, we have observed cases within disability policy where the faulty assumptions of westernised knowledge systems sail through into program delivery uncontested⁵. One particular problem that routinely occurs is when concepts that are developed in a different arena with an explicit function in mind are imported into Indigenous affairs without due consideration of their fitness for purpose, taking into account the cultural, structural and environmental factors that exist in Aboriginal and Torres Strait Islander communities.

As one example within the Issues Paper, we see a red flag in how 'randomised control trials' is being manoeuvred as 'best practice' in evaluation strategy. Designed with one application in mind (clinical trials), there are questions that immediately arise when considering this technique in assessing social programs that support Aboriginal and Torres Strait Islander people:

⁴ This happened to FPDN during the 2018 *Closing the Gap Refresh* consultations. After expending a considerable amount of unfunded time and energy in the submission process; peak body workshops; the design workshop, and the technical workshop, equitable access for Aboriginal and Torres Strait Islander people to the NDIS was summarily dismissed by government as concern for *Closing the Gap*. This was done by a two-word statement in a government document that said disability data was "Not collected". FPDN and equity issues for Aboriginal and Torres Strait Islander people with disability have been ostracised from the *Closing the Gap* engagement activities ever since.

⁵ See for example 'thin markets' as a concept that describes the market for Aboriginal and Torres Strait Islander disability services. Originally devised in financial markets and imported into disability policy, the 'thin markets' narrative disguises the significant unmet demand for disability services from people who are unknown to the existing disability support system. Already this narrative is becoming institutionalised as research grants are being awarded to develop services response for 'thin markets' based on uncontested assumptions. Further analysis available on request.

- (i) What are the ethical considerations in offering support services to one 'experiment group' whilst denying support services to another 'control group' when the population-wide need for support services is so acute?
- (ii) How will a randomised controlled methodology accommodate the multi-faceted complexities in the social circumstances in Aboriginal and Torres Strait Islander communities, when its method is principally designed to measure change by controlling a small number of factors?
- (iii) How will participants be recruited into a randomised control study, when barriers to access are not equal amongst the Aboriginal and Torres Strait Islander population, and the social exclusion experienced by some Aboriginal and Torres Strait Islander is such that they do not access government services in the first place.
- (iv) How to deal with institutional factors to enable a 'like-for-like' comparison between a program and a benchmark? Such institutional factors might include the effect of institutionalised racism in the funding mechanisms that compels Aboriginal community organisations organisation to over-reach upon their organisational resources to deliver services out of an obligation to their communities, an impost that is not necessarily required of organisations that are not Aboriginal community organisations.

This section is not intended to be a comprehensive review on the limitations of randomised control trials. It is merely put forward as one example where experiential knowledge from Indigenous standpoint offers a check and balance to institutionally formed evaluation practices. What we are ultimately concerned about within an evaluation setting is the risk of the 'false negative', whereby worthwhile and effective programs are discarded because the limitations of the evaluation methodology have not been fully critiqued from an Indigenous standpoint, and these undisclosed limitations are carried through into its conclusions.

6. GOOD PRACTICE ENGAGEMENT STRUCTURES EXIST

In highlighting the need for a cultural shift within government agencies on the recognition of Aboriginal and Strait Islander knowledge in the evaluation strategy, we also understand that relationships between government agencies and Aboriginal and Torres Strait Islander communities and organisations to access that knowledge. FPDN's experience in respectful engagement with government agencies is mixed, but we are able to point to good practice examples where enduring relationships have been established and are contributing constructively to the welfare of Aboriginal and Torres Strait Islander people with disability.

One example is the relationship that exists between FPDN and the ABS. There are formal mechanisms of engagement through FPDN's participation on the ABS Indigenous Roundtable and other Advisory groups. These mechanism are supported by multileveled connections whereby the staff at FPDN and ABS can consult with each other to seek advice informally. It is a relationship based on mutual respect that has evolved over many years,

and we have learned how to have the awkward discussions that pop up from time to time without throwing the baby out with the bath water.

We would encourage the Productivity Commission to consider how to make enduring and respectful relationships with Aboriginal and Torres Strait Islander people and organisations as integral to the evaluation strategy.

7. CONCLUDING COMMENT (A CAUTIOUS OPTIMISM)

The key message from this statement is that the review of the evaluation strategy and practices must be accompanied by a cultural shift within government agencies that gives greater acknowledgement and respect for Aboriginal and Torres Strait Islander knowledges and methods in the design, delivery and evaluation of Indigenous programs. Whilst there is a rights dimension to this argument, the quality of decision-making that derives from evaluation will also be vastly improved through greater Aboriginal and Torres Strait Islander input.

We reiterate our support for the appointment on the first Indigenous Productivity Commissioner. This gives us optimism in the leadership capacity to initiate the required cultural shift within government. However, the leadership potential that comes with the appointment of an Indigenous Commissioner will be thwarted unless it is supported by broader cultural change within the Productivity Commission that can serve as a model for other government agencies to follow.

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