



30 August 2019

Indigenous Evaluation Strategy  
Productivity Commission  
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Dear Productivity Commission

**Response to the Productivity Commission Issues Paper on an Indigenous Evaluation Strategy**

Thank you for the opportunity to provide a short response to the Productivity Commission Issues Paper on an Indigenous Evaluation Strategy.

PwC's Indigenous Consulting (PIC) welcomes the recent appointment of the first Indigenous Productivity Commissioner, Romlie Mokak and believes the development of an Indigenous Evaluation Strategy is an important initiative with the potential to create positive change for Aboriginal and Torres Strait Islander peoples.

We hope that our submission is a helpful contribution to informing and shaping the Indigenous Evaluation Strategy. We would welcome the opportunity to engage further with the Productivity Commission as your project progresses.

Overall, the key points this submission makes include:

- **greater focus is needed on efforts to enable Aboriginal and Torres Strait Islander organisations to lead evaluation and strengthen their evaluation capability**
- **a foundational rights based framework and principles are useful to guide evaluations and measure the effectiveness of Indigenous policies and programs**
- **progress towards continually improving accountability systems and capacity development that reflect a whole-of-government approach is important.**

Our submission includes:

1. a short overview of PIC, as an Indigenous business and how our purpose and values underpin our approach to evaluation
2. PIC's response to the four high level questions set out within the Productivity Commission's factsheet informing the Issues Paper.



## About PwC's Indigenous Consulting



Jodie Sizer & Gavin Brown, Co-CEOs

PIC is a certified Indigenous business - a majority Indigenous owned, led and staffed consulting firm. Our purpose is to enable meaningful change in Indigenous communities by realising futures through Indigenous knowledge. Indigenous ownership is fundamental to PIC, and we operate with the philosophy that:

- real and lasting change happens when it is created by Indigenous peoples, not for Indigenous peoples
- the rights of Indigenous communities to create and determine their own futures must be supported.

Our approach to all our work is informed by our purpose and our values of **self-determination**, **truth** and **respect**.

PIC has been operating for over five years and has successfully delivered over 530 projects and engaged with 680 Aboriginal and Torres Strait Islander communities in this time. Our work has included reviews and evaluations of Indigenous programs and policies in all states and territories across Australia.



*Our response to the Productivity Commission's Indigenous Evaluation Strategy Issues Paper, in the context of the four high level questions for this project, is outlined below:*

### **1. How can Aboriginal and Torres Strait Islander knowledge, priorities and values be better integrated into policy and program evaluation?**

Australia's First Peoples have established complex knowledge systems and built, developed, and observed various systems of lore and cultural practices, contributing to their ongoing survival since time immemorial.

Furthermore, Australia's First Peoples have been exercising their traditional governance and decision-making skills to determine their own (sustainable) development priorities for generations.

Unfortunately, a number of historical and systemic socio-economic factors continue to impact the lives of Aboriginal and Torres Strait Islander peoples - limiting their full ability and right to take control of their own future, in their own hands.<sup>1</sup>

In the main, we agree with the Issues Paper that the overall objective of an Indigenous evaluation strategy should be to improve outcomes for Aboriginal and Torres Strait Islander peoples.

PIC's view is that a further objective of the Indigenous Evaluation Strategy should be to support Indigenous peoples to realise their right to self-determination (eg. that evaluations should consider as a default position the principle of Indigenous leadership and decision-making rights, and should take into account the worldviews of Indigenous peoples). The *United Nations Declaration on the Rights of Indigenous Peoples* (the Declaration) supports this,

*'Indigenous peoples have the right of self-determination and by virtue of that right that they freely determine their political status and freely pursue their economic, social and cultural development.'*<sup>2</sup>

There is ample research and evidence that shows that when Indigenous peoples have control of decisions that affect them, this leads to better outcomes. Moreover, very often this decision-making is validated by what might be considered 'best practice'.

***Enable Aboriginal and Torres Strait Islander organisations to lead evaluation and strengthen their evaluation capability***

We believe that a foundational aspect to any effective Indigenous evaluation approach should be to prioritise, value and embed Aboriginal and Torres Strait Islander peoples' knowledge, participation and contribution.

Drawing on our experience working with Aboriginal and Torres Strait Islander peoples, we are acutely aware that Aboriginal and Torres Strait Islander peoples have a deep understanding of their communities, and of the needs and priorities of their families and communities. What we often see however, is that they may not yet have access to the resources or tools to address or focus on these priorities; or that there is a real disconnect between program and policy design and implementation.

Increasing focus and investment in assisting the Aboriginal Community Controlled Organisation (ACCO) sector to build its capacity to lead Indigenous policy and program evaluations is an important way forward to ensuring better outcomes for Australia's First Peoples. Where these organisations have strong connections with their wider community, they provide access to crucial health and human services; have strong and trusted community relationships; and could be a valuable resource for data collection and evaluation.

Across the country, ACCOs are delivering culturally appropriate support services to Aboriginal and Torres Strait Islander peoples, families and their communities however often lack sufficient sustainable funding and resources. We believe that by equipping ACCOs with the skills and capacity to

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<sup>1</sup> Virtually all aspects of Aboriginal and Torres Strait Islander peoples' lives were controlled by a series of state and territory government legislative instruments; controls of Aboriginal peoples' work, income, property, mobility and even the removal of Aboriginal children from their families. To this day, the intergenerational trauma and impacts of removal, dispossession and disempowerment continues to affect the lives of Aboriginal and Torres Strait Islander peoples.

<sup>2</sup> United Nations Declaration on the Rights of Indigenous Peoples, GA Resolution 61/295, UN Doc A/RES/61/295 (2007), art 3.

lead policy and program evaluations, more accurate, culturally appropriate data will be collated that will better demonstrate both the economic and social impact of Indigenous policies and programs. It will also showcase and build an evidence base to demonstrate the significant role ACCOs have in the delivery of impactful services to Aboriginal and Torres Strait Islander peoples, families and communities.

This strong qualitative and experiential data lens (brought forward by local community organisation engagement) would augment quantitative data, thereby providing for a more valuable, comprehensive and accurate picture of the situation and issues in communities. As a result, policies and programs could be better targeted, with this richer and more granular information.

### ***Blending of Indigenous and Western evaluation approaches***

PIC's approach to evaluation combines Indigenous and non-Indigenous knowledge and skills, and recognises that Indigenous ways of knowing are equally as valid as non-Indigenous Western ways of approaching evaluation.

In our experience, this combined approach can be achieved in the following ways:

- 1) Co-design the evaluation framework and methodology with Indigenous stakeholders, including how measures of success for the policy or program are defined. Measures of success are often defined differently by the government and Indigenous communities, multiple measures of success can be defined and used to measure (or 'triangulate') a policy or program's effectiveness.

A best practice approach to undertaking Indigenous evaluations should include establishing a layered Program Logic and Theory of Change that would:

- provide a structure for anchoring future policy and program design
  - establish the foundation for the monitoring and evaluation approach
  - enable the identification of culturally appropriate data and data collection methods
  - guide the specification of the tools and systems that need to be in place to systematically report progress against outcomes and inform Indigenous led decision-making.
- 2) Ensure respectful and meaningful involvement of Aboriginal and Torres Strait Islander communities and those who are the intended beneficiaries of the program or policy. Such an approach would build on strengths to make a positive contribution to the lives of current and future generations of Aboriginal and Torres Strait Islander peoples. In our view this could be considered different language for what are similar initiatives for other parts of government, where there is an emphasis on citizen-centric and human-centred design for government to improve service delivery to 'customers'.
  - 3) Ensure that consultations are conducted in a way that enables Free, Prior and Informed Consent (FPIC) and decision-making from an Indigenous led lens and worldview.
  - 4) Ensure enough time is allocated to engage, to listen and understand the needs and priorities of Aboriginal and Torres Strait Islander peoples and communities involved - respecting local history of the area and cultural protocols of Aboriginal and Torres Strait Islander peoples is critical to building trusted relationships.

- 5) In partnership with Aboriginal and Torres Strait Islander peoples, develop culturally appropriate evaluation tools that Indigenous community organisations can utilise - acknowledging that measures of success might be different for each community.
- 6) As noted above, uncover meaning from both quantitative, qualitative and potentially also experiential data. We do not attempt to deduce general results from statistics or outcomes measures alone, but rather use these in conjunction with methods to incorporate and prioritise Indigenous knowledge to inform findings.

## **2. What principles should guide Australian Government agencies' evaluation efforts?**

### ***Alignment of Indigenous evaluation with the United Nations Declaration on the Rights of Indigenous Peoples***

Evaluation of Indigenous programs and policies should be conducted in a way that recognises the unique rights of Indigenous peoples. As outlined within the Issues Paper, a fundamental international human rights framework that recognises and protects the unique and collective rights of Indigenous peoples is the *United Nations Declaration on the Rights of Indigenous Peoples* (the Declaration).

PIC strongly believes that the foundational principles of the Declaration can be applied to guide the development, implementation and measurement of laws, policies, programs and projects that impact the lives of Aboriginal and Torres Strait Islander peoples. This includes putting the Declaration at the centre of an Indigenous evaluation strategy.

The four foundational principles of the Declaration are:

- *self-determination*<sup>3</sup>
- *participation in decisions that affect Aboriginal and Torres Strait Islander people based on free, prior and informed consent and good faith*<sup>4</sup>
- *respect for and protection of culture*<sup>5</sup>
- *equality and non-discrimination*.<sup>6</sup>

Furthermore, the *Guidelines for Ethical Research in Australian Indigenous Studies* developed by the Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) are founded on respect

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<sup>3</sup> United Nations Declaration on the Rights of Indigenous Peoples, GA Resolution 61/295, UN Doc A/RES/61/295 (2007), arts 4, 5, Preamble 16, 17; International Covenant on Economic, Social and Cultural Rights, opened for signature 16 December 1966, 993 UNTS 3 (entered into force 3 January 1976), art 1; International Covenant on Civil and Political Rights, opened for signature 16 December 1966, (entered into force 23 March 1976), art 1.

<sup>4</sup> *United Nations Declaration on the Rights of Indigenous Peoples*, GA Resolution 61/295, UN Doc A/RES/61/295 (2007), arts 18, 19, 5, 10, 11(2), 27, 28, 29, 32(2), 41, 46.

<sup>5</sup> United Nations Declaration on the Rights of Indigenous Peoples, GA Resolution 61/295, UN Doc A/RES/61/295 (2007), arts 1, 31, 11(1), 11(2), 12(1), 13(1), 15(1), Preamble 3, 7, 10, 11.

<sup>6</sup> United Nations Declaration on the Rights of Indigenous Peoples, GA Resolution 61/295, UN Doc A/RES/61/295 (2007), arts 8(1)(e), 9, 15(2), 21(1), 22(1), 44, 46(3), Preamble 5, 9, 18, 22.

for these rights.<sup>7</sup> These guidelines contain a set of principles that could be adopted as principles in an Indigenous Evaluation Strategy.

PIC has set out some considerations that we think about when undertaking projects that are consistent with the AIATSIS guidelines. These include:

- The importance of context, community and history – deep understanding of the community and the history and how this informs current narratives, socio-economic environment and aspirations and, health and wellbeing.
- The importance of diversity and place, all communities are different and may not want the same things or see 'success' in the same way.
- Connectedness and view of whole community – not seeing one policy or program without the rest of the service system.
- The importance of human rights, including self determination - putting Indigenous peoples and communities in control of the decisions that affect them.

### ***3. What should be the priority policy areas for future Australian Government evaluation efforts?***

We understand that the Indigenous Evaluation Strategy will only apply to Australian Government agencies however, as the Issue Paper recognises, other stakeholders are involved in policy and program development, implementation and evaluation.

It is our view that any policy or program aimed to improve outcomes for Aboriginal and Torres Strait Islander peoples, should be developed with the active participation of Aboriginal and Torres Strait Islander peoples themselves - from idea inception through to development, implementation and evaluation.

Therefore, consistent with this view, Aboriginal and Torres Strait Islander peoples themselves should be active participants in identifying the priorities and setting the parameters of evaluation activities.

As discussed in this submission, we recognise ACCOs as respected organisations in their own right in supporting Aboriginal and Torres Strait Islander peoples, families and communities. As such, we value and support the role they have or can have in Indigenous evaluation, which is consistent with Article 23 of the Declaration,

*'Indigenous peoples have the right to determine and develop priorities and strategies for exercising their right to development. In particular, indigenous peoples have the right to be actively involved in developing and determining health, housing and other economic and social programmes*

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<sup>7</sup> AIATSIS, *Guidelines for ethical research in Australian Indigenous studies*, 2012. At: <https://aiatsis.gov.au/sites/default/files/docs/research-and-guides/ethics/gerais.pdf>.

*affecting them and, as far as possible, to administer such programmes through their own institutions.<sup>8</sup>*

***Progress towards continually improving accountability systems and capacity development that reflect a whole-of-government approach***

Drawing on our experience working closely alongside government agencies and Aboriginal and Torres Strait Islander communities, we notice a range of systemic structural factors exist which collectively impact and have adverse long term effects on the lives of Aboriginal and Torres Strait Islander peoples.

In all the work we do, our firm seeks to find solutions to address these systemic factors.

In recent years, we have seen a number of improved accountability measures incorporated into funding regimes, such as the Indigenous Advancement Strategy (IAS) guidelines and processes, and whole-of-government partnership agreements, such as the recent *Closing the Gap Partnership Agreement*, with Aboriginal and Torres Strait Islander Community Controlled Health and Peak Organisations.

Despite being complex and multi-layered, we remain optimistic that the current and future governments will continue to build whole-of-government capability in improving outcomes of Aboriginal and Torres Strait Islander peoples. This cannot be done without strong genuine partnerships with Aboriginal and Torres Strait Islander peoples; effective and culturally appropriate evaluation of policies and programs; and, increased, sustained funding measures to support Indigenous led outcomes.

***4. How can evaluation results be better used in policy and program design and implementation?***

***The environment in which evaluation results will be generated***

Evaluations will only be useful in informing policy and program design and implementation where the approach and methodology that has been adopted is fit for purpose, and based on accurate data that is interpreted in the correct context. PIC welcomes the increased focus on evaluating Indigenous policies and programs, but we believe that it will only be possible to understand 'what works' for Aboriginal and Torres Strait Islander peoples when they are active participants in the design and delivery of evaluations.

In our co-design work around the country, including on major reform projects, we have seen that Aboriginal and Torres Strait Islander communities who have been appropriately informed and are generally actively engaged and can bring forward impressive program, policy and service design input in relatively little time.

***Embedding an evaluation 'practice' into programs***

In addition, evaluations are more likely to be used to inform decisions on policies and programs if they are undertaken at suitable intervals throughout the implementation period. Organisations often wait until a program or policy is nearing completion before undertaking an evaluation.

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<sup>8</sup> *United Nations Declaration on the Rights of Indigenous Peoples*, GA Resolution 61/295, UN Doc A/RES/61/295 (2007) art 23.



At the beginning of programs, this could be achieved by co-designing the initial Program Logic or Theory of Change with community-level stakeholders so that the ultimate objectives of the program are absolutely clear, and that measures of success have been informed by Indigenous peoples as well as government. This practice would of course also provide a clear link between activities and the ultimate objectives of the program - and in doing so, also assist in ensuring value for money for the government (ie. resources are properly targeted and aligned to co-designed and agreed program objectives, rather than without this crucial foundational element).

As programs progress, and as noted above, it is possible to engage community stakeholders in the capture of relevant and timely data, to assist in the ongoing evaluation of the programs. And of course at the conclusion of programs, all of the above would represent useful inputs into this culminating process.

We believe that ongoing monitoring and evaluation of Indigenous programs and policies from inception is important in ensuring that:

- policies and programs are not resulting in unintended consequences, including causing harm, trauma and distress for Aboriginal and Torres Strait Islander peoples
- policies and programs that are making a difference for Aboriginal and Torres Strait Islander peoples and communities are not defunded
- opportunities can be identified to build partnerships and collective policy and program impact approaches with Aboriginal and Torres Strait Islander peoples and government agencies to support sustainable efforts to deliver positive outcomes.

We would be pleased to discuss any aspect of our submission to the Productivity Commission and look forward to any future opportunity to contribute further to the development of an Indigenous Evaluation Strategy.

Yours sincerely

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At PIC, our purpose is to improve the lives of Indigenous peoples and support self-determination through empowering Indigenous led models and solutions. With over 50 staff located in 8 offices across Australia, we offer a full suite of consulting services, regularly collaborating with PwC and its extensive array of specialist business services. Find out more and tell us what matters to you by visiting us at [www.pwc.com.au/pic](http://www.pwc.com.au/pic). Liability limited by a scheme approved under Professional Standards Legislation.