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# National Indigenous Australians Agency

## Submission on the draft

### Productivity Commission Indigenous Evaluation Strategy

August 2020

#### **INFORMATION REQUEST 5.1**


*The Commission is seeking information on effective engagement strategies for evaluation. What engagement models are most effective? For what types of evaluations is co-design most useful? Why?*

This question is as much about best practice for Indigenous engagement more broadly as it is about engagement in evaluation specifically. The choice of engagement strategies in the context of different types of evaluation being undertaken is addressed below.

It is important to consider the need for engagement strategies for evaluation to be aligned with broader Indigenous engagement and place-based decision-making frameworks. This acknowledges that evaluation does not occur in isolation. Aligning engagement strategies for evaluation with broader Indigenous engagement approaches can support the conduct of better quality evaluation.

Noting the capacity for government to re-orient investment decision-making through a place-based framework is evolving (i.e., through Indigenous Voice, evolution of the Empowered Communities model and through the new Closing the Gap agreement), the strategy would be strengthened by discussion of the need for linkages with local and regional decision-making frameworks. Governance of the proposed Indigenous Evaluation Council will be an important mechanism for achieving this.

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Relationships are central to the nature of ‘Indigenous evaluation’ and are therefore central to effective engagement strategies for evaluation. This is recognised in the international literature about Indigenous evaluation, such as the special edition of *New Directions for Evaluation* (Cram, 2018). Relational principles for co-design can apply in all types of evaluation, at a range of scales—from the very large scale Department of Health evaluation of the Indigenous Australians Health Programme (IAHP) (as noted in the Background Paper, p. 176) to smaller place-based evaluations.

NIAA is supportive of the co-design approach discussed, particularly the role of Indigenous communities and organisations. It should be noted however, that any engagement approach needs to be grounded in the reality of what is feasible in the circumstances. It may also be useful to consider how engagement can include capacity building, in order to help introduce innovative thinking from new participants and reduce the burden on regular participants. The Commission could consider international best practice in the area of effective engagement strategies for Indigenous evaluation, including Indigenous leadership in evaluation.

The establishment of Indigenous co-design groups requires an understanding of, and giving respect to, local contexts (or for larger projects, sectorial or system contexts). This may be through giving existing local Indigenous governance groups a role in evaluation co-design, advisory and decision making. It may also be through establishing new groups to inform the evaluation.

Co-design approaches, including their governance mechanisms, should be fit-for-purpose to the type of evaluation being undertaken (e.g. young men or young women’s groups may be appropriate for youth program evaluations). Ultimately, Indigenous communities and organisations should play the key role in determining what governance structures and composition forms are suitable to ensure these are culturally appropriate. This needs to involve active promotion of participation by Indigenous academics and Indigenous-led institutions, organisations or companies to participate in evaluation, and local community members to participate in data collection. This increases ownership of evaluation, and improves the potential for culturally responsive evaluation practice.

‘Research Participation Agreements’ provide a basis to help clearly articulate co-design roles. They provide a platform to capture Indigenous priorities in regards to what should be evaluated and how, by setting ‘rules of engagement’. These agreements set the scene for shared roles in decision-making and contributions to the evaluation process. They also articulate how participation in evaluation, and the impact from findings of the evaluation, will be of benefit to Indigenous communities and people involved. This participation agreement concept has been adopted in the IAHP Evaluation, with co-design governance including both community co-design groups and a health sector co-design group (staff of NIAA with specialist methodological expertise in Indigenous evaluation are members of this group).

References for Indigenous evaluation:

Cram, F. (2018). Conclusion: Lessons about Indigenous evaluation. In F. Cram, K. A. Tibbetts, & J. LaFrance (Eds.), *Indigenous Evaluation*. *New Directions for Evaluation*, 159, 121–133.

**INFORMATION REQUEST 6.1**

*The Commission proposes that the interim evaluation priorities for the Indigenous Evaluation Strategy be broad and based on the Council of Australian Governments and the Joint Council on Closing the Gap draft policy priorities. Is this appropriate?*

The NIAA supports basing the interim evaluation priorities for the Indigenous Evaluation Strategy on the National Agreement on Closing the Gap draft policy priorities, when it is finalised. Other government priorities, such as Empowered Communities and Indigenous Voice, could inform future evaluation priorities.

We agree that further refinement of these priorities should occur via the targeted consultation with Aboriginal and Torres Strait Islander people planned by the Commission, between the draft and final report. In refining the priorities, it would be useful for the Commission to consider ‘streams of inquiry’ to be addressed through evaluation—this recognises the value of systems-oriented questions and the potential value of systems evaluations. However it should be noted that it is difficult to address systems-oriented questions (particularly if they are pitched at a national level) in a place-oriented context. The utility of information arising from evaluation for many Aboriginal and Torres Strait Islander people will be fundamentally based on the relevance of information to particular place and context and the priorities of particular communities and/or regions. Consideration could be given to either focusing systems-oriented questions on communities or systems as they operate in local contexts, and/or including layers of systems-oriented questions in evaluation designs. While this increases the complexity of evaluation design, it has the potential to address the reality of complex systems of service delivery and community patterns of service use. It also moves beyond evaluation being driven purely by administrative funding arrangements.

The Commission has acknowledged the need for a cross-systems focus to evaluation to be taken. For example, the Commission highlights the underlying issues (relevant to all policy and programs) of ‘racism, discrimination and ‘social inclusion, healing and trauma’, as well as the strengths-oriented goal of ‘the promotion of cultures and languages for Aboriginal and Torres Strait Islander people’ (p.202).

Three of the priority reform areas also point to fairly specific lines of inquiry—i.e. the structures for shared decision making, community control of service delivery and access to local data. These topics appear to be sufficiently specific, that it would be possible to plan relevant evaluations. The reform topics may also be priorities or principles that guide the design of evaluation frameworks, rather than, or in addition to, priorities to be evaluated.

In further developing the priority reform areas, it would be helpful if the Commission could consider how the cross-priority reform areas might work in concert with the broader priority reform areas. Implementation plans for priority reform areas will need to take into account of the requirement that these areas will be evaluated, and, hence a set of evaluation questions will need to be developed.

As the Commission notes, evaluation needs to focus on areas where programs have the largest impacts on the lives of Aboriginal and Torres Strait Islander people. In order to identify the areas of potentially greatest impact, it is important that policies and programs have a sufficiently detailed theory of change, which identifies assumptions, expectations and known risks of policy or implementation failure. It is therefore desirable that theories of change be based on evidence as well as stakeholder knowledge and perceptions. This highlights the importance of an easily accessible evidence base (i.e., through a Clearinghouse). References on theories of change and evidence-based policy are provided below.

The centring of Aboriginal and Torres Strait Islander people is crucial to Indigenous Evaluation. It is not clear from the background paper how the material provided through submissions by Indigenous people, and the assessment of evidence, have been incorporated into the interim priorities.

Further research, development and consultation on the 'utility' to Aboriginal and Torres Strait Islander people of the areas proposed for evaluation needs to be undertaken. This is an important point and, as noted above, the question of 'utility' should be considered further, particularly in terms of stronger coverage in the strategy of place-based frameworks.

As noted by the Commission (p 155, Background paper), 'High-quality evaluation starts with an 'evaluable' policy'. A feature of 'evaluability' is the potential utility of evaluation results to the end users. References on the concept of 'evaluability', as adopted by the evaluation sector internationally, are provided below.

References for evaluability assessment:

Joseph S. Wholey, Harry P. Hatry, Kathryn E. Newcomer. Handbook of Practical Program Evaluation, John Wiley & Sons, 2010.

What Works Scotland, Evaluability Assessment working paper – <http://whatworksscotland.ac.uk/wp-content/uploads/2015/07/WWS-Evaluability-Assessment-Working-paper-final-June-2015.pdf>

References for theories of change and evidence-based policy:

Funnell, S. & Rogers, P. (2011). Purposeful Program Theory: Effective use of theories of change and logic models. Jossey-Bass: San Francisco.

Pawson, R. (2002). Evidence-based Policy: The Promise of 'Realist Synthesis'. Evaluation, Vol 8(3):340-358.

**INFORMATION REQUEST 7.1**

*The Commission is seeking participants' views on which current Australian Government agency would be best placed to house the Indigenous Evaluation Clearinghouse: the Australian Institute of Health and Welfare; the Australian Institute of Family Studies; the Australian Institute of Aboriginal and Torres Strait Islander Studies; the Productivity Commission; or some other agency?*

The success of the Indigenous Evaluation Clearinghouse will depend on influencing policy makers in mainstream contexts as much as those operating in Indigenous specific contexts. In setting up the Indigenous Evaluation Clearinghouse, it will be important to establish partnerships with other evidence-based bodies in key policy areas, e.g. the new national education evidence institute being established by the Australian Government Department of Education, Skills and Employment (DESE). Partnerships with evidence-based repositories at jurisdictional levels could also be considered; for example, NSW Education has established its own education evidence institute, alongside its Centre for Evaluation.

A critical role for an Indigenous Evaluation Clearinghouse will be the production of synthesis reports which promote the use of evaluation knowledge, as opposed to research (Ottoson & Hawe, 2009). Policy makers need help in understanding the evidence-based implications of a theory of change in a complex or adaptive context (e.g. across sectors or geographies). It is important that mainstream policies and programs are informed by evidence gained from the delivery of Indigenous specific policies and programs. As the Commission notes in the Background Paper, 'no single evaluation will provide robust information that can be generalised, but the information from an evaluation adds to the evidence base built up over time and across different contexts' (p. 226).

**References for transferable evaluation knowledge and use:**

Ottoson, J.M., and Hawe, P. (eds). 2009. Knowledge Utilization, Diffusion, Implementation, Transfer, and Translation: Implications for Evaluation. New Directions for Evaluation No.124 (Winter). American Evaluation Association.

**INFORMATION REQUEST 7.2**

*The Commission is seeking participants' views on the location of an Office of Indigenous Policy Evaluation to oversee Australian Government agencies' implementation of the Indigenous Evaluation Strategy. Which current statutory agency would provide the best location for the Office of Indigenous Policy Evaluation, and why?*

The success of the Indigenous Evaluation Strategy will be dependent on the establishment of the Centre for Evaluation Excellence *and* the Office of Indigenous Policy Evaluation. Change is needed across the Australian Public Service to both evaluation capability and evaluation use to achieve the intended outcomes of the Indigenous Evaluation Strategy. Particularly important to the success of both bodies will be the appointment of an 'eminent' person to lead each one. This will increase the likelihood of success in influencing change across the Australian Public Service.

As recognised by the Commission, the Centre for Evaluation Excellence/Office of Indigenous Policy Evaluation will need to play more than a 'compliance' role to effect change. It will also need to help change mindsets across the Australian Public Service (as described in box 8.2 of the Background Paper). This will mean bringing people into the Centre who are not just evaluation experts, but are also skilled in the art of effecting change. Training and practice in evaluation across a range of Australian Government agencies will be necessary to embed a culture of evaluative thinking.

It would be helpful if the Commission could unpack how the process of 'new policy proposals indicating whether they contribute to the government-wide evaluation priorities' would help embed evaluation early in the policy cycle. It would also be useful for the Commission to consider what assurances are currently in place to demonstrate that Australian Public Service officers have the appropriate skillset to make a 'systematic assessment' about ethical risk to determine whether formal ethics approval is required for an evaluation (as suggested on page 27 of the Guide to Evaluation). Our experience at the NIAA suggests that developing capability in understanding *why* ethics approvals are required is a foundational learning requirement in commissioning evaluations. To support this, we provide training to NIAA staff on the AIATSIS guidelines for ethical research.

It will take time to embed a culture of evaluative thinking. We note that the Commission reproduced 'the IAS Evaluation Framework evaluation maturity matrix' (on page 352 of the Background Paper) that the Australian National Audit Office published in its report on Evaluating Indigenous Programs (June 2019). The NIAA would highlight that this maturity matrix did not feature tested timeframes, and it may be unrealistic to expect the Indigenous Evaluation Strategy to take effect in similar timeframes, particularly in the absence of a broader Australian Public Service-wide Centre for Evaluation Excellence. A useful source of literature is *Enhancing evaluation use: insights from internal evaluation units*, edited by Marlène Läubli Loud and John Mayne. This book provides international examples which recognise the importance of designing a system to foster a culture of evaluative thinking. Läubli Loud and Mayne provide valuable research-based insights about systems thinking, organisational cycles and leverage points (p.208).

**Reference:**

Läubli Loud, M. and Mayne, J. (Eds) (2013). *Enhancing Evaluation Use: Insights from Internal Evaluation Units*. Sage Publications

**INFORMATION REQUEST 7.3**

*The Commission is seeking participants' views on how members of an Indigenous Evaluation Council might be appointed. For example, could members be nominated by the Aboriginal and Torres Strait Islander community controlled sector for their experience in research, monitoring and evaluation, or based on some other factors? Would the host agency for the Office of Indigenous Policy Evaluation, and/or the Australian Government, need to be members?*

The NIAA considers the Indigenous Evaluation Council should be independent in order to provide impartial advice to the Government. One member of the Committee could be appointed from the host agency.

The Indigenous Evaluation Committee of the NIAA is an example of an expert committee established to provide advice to a Government Agency. While the majority of the NIAA Indigenous Evaluation Committee members are independent and external to the Agency, one committee member is a Deputy Chief Executive Officer of the NIAA. External members of the NIAA Indigenous Evaluation Committee are appointed by the Chief Executive Officer of the NIAA. External members of the NIAA Indigenous Evaluation Committee have been selected on the basis of evaluation-specific expertise and experience.

The partnership arrangements supporting development of the National Agreement on Closing the Gap provide an example of how the Council might represent Aboriginal and Torres Strait Islander people's interests in making evidence based decisions on the design, implementation and evaluation of policies and programs.

Members appointed to the Council should ideally have evaluation-specific expertise and experience in key policy and program areas such as health and education. Deep place-based knowledge and expertise would also greatly contribute to the role of the proposed Council in ensuring effective engagement with Aboriginal and Torres Strait Islander people. If it is difficult to establish full Council membership from the evaluation and research sector, a proxy could be used before the Council is established to bridge between sectors, and potentially have a role in advising on future appointments.

**INFORMATION REQUEST 9.1**

*The Commission is seeking feedback on the indicators that are highest priority for inclusion in the data dictionary. What outcomes and indicators are most informative for government and Aboriginal and Torres Strait Islander people?*

**INFORMATION REQUEST 9.2**

*Which data linkages would best support the Indigenous Evaluation Strategy? Which data linkages are important to Aboriginal and Torres Strait Islander people?*

The Commission rightly recognises the importance of Indigenous data governance. As is discussed in the report, it is critical that genuine involvement with Indigenous Australians occur at all stages in the data development process. A data dictionary may be an important part of an improved approach, however, it will not alone be sufficient to improve data governance.

Recent negotiations on a revised Closing the Gap framework provides guidance on outcomes and indicators that are most informative for government and Aboriginal and Torres Strait Islander people. The outcomes and indicators include considerations of community, culture and connection to country, and have been the result of extensive consultation with Indigenous Australians. The negotiations have highlighted that significant data development is needed if data is to be available to underpin an expanded, richer approach. This includes supporting local data collection efforts to provide an enhanced understanding of what is happening in different local contexts.

The negotiated Closing the Gap priorities will help embed use of data by requiring development of uniform definitions to measure outcomes and report on indicators. In identifying indicators, the Commission should give consideration to:

- Aboriginal and Torres Strait Islander Social and Health Surveys, as these are based on extensive engagement with Indigenous Australians
- Local initiatives that have developed indicators and data that are important to Indigenous communities. The work of the Yawuru (Western Australia), and Yorta Yorta (Victoria) are good examples of this.

Additionally, and as these examples illustrate, this goes to a broader question of evaluation and data collection capability and support/infrastructure at the community and regional level. The Draft Strategy largely deals with evaluation capability and quality improvement at the Australian Government agency level.

The Commission's discussion of current processes within government for data collection and linkage provides an accurate picture of recent developments. In addition to the points discussed, a renewed general commitment to data sharing, and to contestability and innovation in data linkage and development, is also needed. There are instances where, in important areas of research involving Indigenous Australians, the default position of some data custodians is not to share data. This persists even where processes and structures are in place to ensure safe data sharing and use. At the Commonwealth level, a new legislative framework on data sharing and transparency exists that should provide greater comfort to data custodians.

The Commission could give greater consideration to how open, contestable and cost effective data linkage and development processes are. There is a need to keep such processes open to a range of experts and institutions, subject to safeguards, at all levels of government and academia. The aforementioned new legislative framework, building on the 'five safes' approach, is again noted here as one important element.





Finally, if we are to continue our focus on local decision making processes, it is important to have local data available to local communities, with support for these communities to understand and use that local data, and with appropriate Indigenous governance mechanisms in place. Useful examples here include the forthcoming work to develop regional profiles by the Coalition of Peaks in partnership with the Indigenous Data Network, based at Melbourne University; the recently developed INZight tool for point and click data analytics; and initiatives connected to the Community Grants Hub that give services access to local data in exchange for the organisation providing a minimum dataset.

