

INDIGENOUS EVALUATION STRATEGY

Submission by The Fred Hollows Foundation

The Fred Hollows Foundation (The Foundation) is a leading international eye health non-government organisation that has been actively programming in Australia since 1999. We continue the legacy of former Australian of the Year, the late Professor Fred Hollows who believed everyone should have the same access to good eye health.

By working in collaboration with the Aboriginal Community Controlled Health sector and the eye health sector, The Foundation commits to ensuring that a world-class eye health system is in place and accessible to Aboriginal and Torres Strait Islander Peoples.

The Foundation congratulates the Productivity Commission (the Commission) on the development of the draft *Indigenous Evaluation Strategy* (the Strategy) and welcomes the opportunity to provide a submission on the draft. The Foundation made a submission to the Commission on its development of an Indigenous Evaluation Strategy in 2019 and notes that some of those recommendations are reflected to varying degrees in the Strategy.

The Foundation believes that the Strategy could be further strengthened through an explicit commitment to self-determination and free, prior and informed consent.

Key Recommendations

The Foundation recommends that:

1. Self-determination, and free, prior and informed consent are core principles of the Strategy, and underpin the objective and other principles.
2. The objective of the Strategy includes explicit reference to responding to the needs, aspirations and priorities of Aboriginal and Torres Strait Islander Peoples, as decided by them, in line with the principle of self-determination.
3. The Strategy commits to upholding and protecting Indigenous data sovereignty.
4. The 'credible' principle commits to privileging what is credible from Aboriginal and Torres Strait Islander Peoples and their communities first and foremost.
5. The 'credible' principle recommends a strengths-based approach to evaluations (rather than operating from a deficit model).
6. The 'useful' principle commits to conducting cross-agency/cross-program evaluation.
7. The 'ethical' principle commits to acknowledging and addressing power imbalances whilst conducting evaluations.
8. The 'ethical' principle commits the Australian Government to 'do no harm' through evaluations and that evaluations will be conducted in culturally safe ways.

Power, self-determination and Indigenous data sovereignty

The Strategy discusses the need to enhance the use of evaluations by the Australia Government to not only improve trust between the government and Aboriginal and Torres Strait Islander Peoples, but also to 'improve the experiences of Aboriginal and Torres Strait Islander Peoples who are engaged in evaluations conducted by Australian Government agencies' (p5-6). However, the Strategy does not acknowledge the current imbalance of power between the Australian Government and Aboriginal and Torres Strait Islander Peoples. The Strategy should acknowledge and explicitly address this imbalance of power, through a commitment to upholding the right to self-determination and free, prior and informed consent, and to supporting Indigenous data sovereignty.

Recommendation 1: Self-determination and free, prior and informed consent as core principles

Self-determination is not mentioned in the Strategy and this is a fundamental flaw. The Foundation notes that self-determination is implied through the Aboriginal and Torres Strait Islander leadership in the suggested Indigenous Evaluation Council. However, upholding the right to self-determination and free, prior and informed consent should be an explicit principle, and should underpin the Strategy's objective and other principles.

By explicitly upholding and integrating self-determination, the Strategy will align with the UN Declaration on the Rights of Indigenous Peoples (article 3)¹ as well as the Partnership Agreement on Closing the Gap. This states 'Aboriginal and Torres Strait Islander self-determination is recognised as key to achieving change in the lives of Aboriginal and Torres Strait Islander people'². The new National Closing the Gap Agreement developed with the Coalition of Peaks further underlines the importance of self-determination in closing the gap on health outcomes: 'commit to building and strengthening structures that empower Aboriginal and Torres Strait Islander people to share decision-making authority with governments to accelerate policy and place-based progress against Closing the Gap (priority reform 1)³. As the Strategy references the Closing the Gap targets as key areas for evaluation focus, it should also align to, and support, its underpinning principle of self-determination.

This will also align the Strategy with the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander research (draft)⁴ which states that 'consent is a fundamental tenet of ethical research. For Aboriginal and Torres Strait Islander research, free, prior and informed consent of a people or group (in addition to any individual participants) may be necessary to enable the exercising of self-determination and effective engagement'.

Self-determination and the other principles

The Foundation notes that self-determination underpins the guiding principle, through centring Aboriginal Torres Strait Islander Peoples, perspectives, priorities and knowledges. This should also include a commitment to ensuring that Aboriginal and Torres Strait Islander Peoples and communities can decide how information such as history, stories, community issues and culture, are defined and represented in evaluations. This respects the right of Aboriginal and Torres Strait Islander Peoples to determine how those perspectives, priorities and knowledges are used by the Australian Government⁶.

The explicit inclusion of self-determination as a core principle of the Strategy also has implications for the four principles. Through the lens of self-determination, it is clear that it must be Aboriginal and Torres Strait Islander Peoples who decide what is credible, useful, ethical and transparent.

The Foundation also stresses the need for 'free, prior and informed consent' as a part of the other four principles. There cannot be self-determination without free, prior and informed consent. The Australian Government must obtain Aboriginal and Torres Strait Islander Peoples free, prior and informed consent before all evaluations, and any program or policy responses based on the findings of those evaluations⁶. Adherence to this principle should be overseen by the Office of Indigenous Policy Evaluation.

Recommendation 2: Self-determination in the Strategy's Objective

The objective of the Strategy is currently: 'to improve the lives of Aboriginal and Torres Strait Islander people by having policy and program decisions informed by high quality and relevant evaluation evidence'. Without an overarching and explicit commitment to self-determination, there is a critical question around *who* has the power to decide what constitutes 'improving the lives of Aboriginal and Torres Strait Islander people'.

The objective of the strategy must include explicit reference to responding to the needs, aspirations and priorities of Aboriginal and Torres Strait Islander Peoples, as decided by them, in line with the principle of self-determination.

Recommendation 3: Indigenous Data Sovereignty

The Strategy makes no reference to Indigenous Data Sovereignty which is another oversight. Indigenous data sovereignty and self-determination are reliant on each other, and without a commitment to both, the Strategy will not meet its core objective, or uphold its guiding principle.

The Foundation recommends that the Strategy build in mechanisms to support Aboriginal and Torres Strait Islander Peoples' leadership and ownership of data, and use of locally owned data to inform the design and implementation of solutions. The Foundation refers the Commission to the work of the [Maiaam nayri Wingara Indigenous Data Sovereignty Collective](#)⁷, which defines how data sovereignty can be reflected in Indigenous data governance: 'exercising Indigenous data governance enables Indigenous peoples, our representatives and governing bodies to accurately reflect our stories. Effective Indigenous Data Governance empowers our Peoples to make the best decisions to support our communities and First Nations in the ways that meet our development needs and aspirations'. The Foundation refers the Commission to the [OCHRE Evaluation Blueprint](#)⁸ for an example of how these principles have been reflected in a state government evaluation strategy (p21).

Guiding Principles

The Foundation makes the below recommendations to strengthen the four guiding principles.

Recommendation 4 and 5: Credible

Evaluation approaches, methods and processes must be credible if policy and program design and implementation decisions are to be based on evaluation findings. Evaluations should be conducted by evaluators who are technically and culturally capable. (the Strategy, p12)

To further strengthen the Strategy, the 'credible' principle should include:

- A commitment to privileging what is credible from the perspective of Aboriginal and Torres Strait Islander Peoples and communities first and foremost. The Foundation refers the Commission to the OCHRE Evaluation Blueprint⁸ as to how this can be reflected more comprehensively in the Strategy. The OCHRE Evaluation Blueprint commits to conducting evaluations 'where findings are credible to the Aboriginal community, to the public sector and to independent academics. Credibility among these diverse groups will be sought both by integrating differing research methods and by incorporating a diversity of perspectives' (p16).
- A preference for engaging local evaluators who understand the context and have credibility with their communities. This will enhance the credibility of Australian Government evaluations and help address power imbalances.
- A commitment to using strengths-based approaches in evaluations (rather than operating from a deficit model).
- Further exploration of what participatory engagement of Aboriginal and Torres Strait Islander Peoples in all stage of evaluation planning, design and conduct looks like. Participatory approaches should strengthen the level of engagement with participants, increase the opportunity for voices that are not normally heard to be heard, and generate discussion. This must happen during the whole evaluation process, from planning to dissemination of findings, and the implementation of any proposed changes in policy or program as a result of the findings⁹.

Recommendation 6: Useful

Evaluation needs to be useful. Evaluations that do not provide useful results are a waste of resources. When Australian Government agencies plan, commission or conduct an evaluation, that intention should always be to use the evaluation's findings to inform policy and program decisions. (the Strategy, p14)

To further strengthen the Strategy, the 'useful' principle should include:

- A commitment to cross-agency/cross-program evaluations. The Strategy should work toward cross agency evaluations that evaluate the holistic impact of a number of policies or programs impacting Aboriginal and Torres Strait Islander Peoples. This will not be relevant or feasible for every evaluation however agencies should look to conduct cross-agency or cross-program evaluations, especially where the policy or program being evaluated:
 - Intersects across a number of policy areas (e.g. health, education, employment); and/or,
 - Is one of a number of policies or programs implemented in a particular community or region.
- A commitment to consider an evaluation's 'usefulness' from both an Australian Government perspective and from the perspective of Aboriginal and Torres Strait Islander communities. This means that Aboriginal and Torres Strait Islander Peoples involved in or affected by an evaluation should benefit from it¹⁰.

Recommendation 7 and 8: Ethical

All stages of evaluation – planning, commissioning, conduct, reporting and use – should be conducted in an ethical way. Applying ethical standards improves the quality and consistency of evaluation and ensures that evaluation has a positive impact on Aboriginal and Torres Strait Islander people. (the Strategy, p16)

The ethical principle should include:

- A commitment to acknowledging and addressing power imbalances whilst conducting evaluations. This includes:
 - Evaluators (whether Australian Government or external) working with humility and self-reflection, understanding differences in worldviews. Cultural humility is an important step in helping to redress the imbalance of power inherent in relationships between practitioners and those they serve and collaborate with on shared activities⁵. Demonstrated capability to work this way should be part of the selection process of evaluators⁴. The Foundation refers to Productivity Commission to our '[Cultural Protocol for Evaluation](#)' as an example of how a non-Indigenous organisation frames this approach.
 - All parties should seek to understand differences in world views and the influence of these world views on perceptions of success, process, respect and benefits. The use of strengths-based evaluation approaches will also provide an opportunity to demonstrate respect for different world views.
- A requirement that evaluations must be culturally safe. This must be central to the ways in which the Australian Government conducts evaluations. Evaluators must have demonstrated that they have experience in conducting culturally safe evaluations⁴. This includes the use of culturally appropriate data collection tools and approaches, as the accuracy and quality of the data collection will depend on the appropriateness of the tools used, and the cultural responsiveness of those collecting the data.

- A commitment that evaluations must ‘do no harm’. This means:
 - Actively ensuring that the wellbeing of participants in evaluations is protected. This may include making sure that no unfair burden is placed on certain individuals or groups, and peoples’ privacy, human rights and dignity are protected.
 - Ensure that the evaluation process and outcomes do not contribute to discrimination, marginalisation or exclusion of individuals or groups⁵.
- An ethical evaluation is one in which the findings are used and responded to. An evaluation is not ethical unless its findings are acted upon. The Foundation acknowledges that the use of evaluations is covered under the ‘useful’ principle. This should also be reflected as part of the ethical principle, given the importance of the Australian Government using evaluations to develop and implement better policies and programs that respond to the needs, priorities and aspirations of Aboriginal and Torres Strait Islander Peoples, as determined by them.

Transparent

Transparency increases accountability of agencies and government to the community. It also allows evaluation users to judge the credibility and rigour of evaluation techniques used, and provides incentives for agencies to commission and conduct high-quality evaluations.

The Foundation acknowledges the number of concrete actions that the Productivity Commission is recommending that will lead to greater transparency of the Australian Government’s use of evaluations.

The Foundation also suggested that the mechanisms suggested above to ensure appropriate feedback is given to Aboriginal and Torres Strait Islander Peoples on the findings and use of evaluations also contributes to transparency, good decision making and accountability.

Other issues: Australian Government capacity building to conduct evaluations

The Strategy should be framed to build evaluation skills within the Australian Government. Currently, the term ‘enhance’ is used a number of times throughout the document. However, the Strategy itself acknowledges the current lack of capacity within the Australian Government to conduct evaluations: ‘the quality of evaluations of policies and programs affecting Aboriginal and Torres Strait Islander people is variable (and in some cases lacking). And while policy makers agree that evidence is critical for good policies, many admit that in practice they do not rely heavily on evidence, or past experience, when formulating or modifying policies and program’ (p5). The Strategy therefore should be framed to build these skills, rather than improve or enhance them.

The Foundation notes the need to build capacity of Australian Government staff to conduct or commission evaluations in culturally safe ways, and suggests that the Strategy prioritise this capacity building. This evaluation capacity building approach should involve developing an organisational culture of collective learning using ethically and culturally responsive strategies. Systems should sustainably and continuously support Australian Government staff to use quality evaluations, and develop the Australian Government’s capability and capacity to routinely and effectively monitor and evaluate projects. Evaluations should be part of a continuous quality improvement process, and findings should feed back into the program/project management cycle¹¹.

Contact

The Foundation is happy to provide further information about the recommendations raised in this submission. For further information, please contact:

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References

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