



28 July 2020

Indigenous Evaluation Strategy

Productivity Commission

Locked Bag 2, Collins Street East

Melbourne VIC 8003

Dear Productivity Commission

Ninti One welcomes the opportunity to provide a submission to the Productivity Commission on the recently released *Draft Indigenous Evaluation Strategy (IES)*.

Established in 2003, Ninti One is a not-for-profit, Indigenous business that builds opportunities for people in remote Australia through research, innovation and community development. Our work has included reviews and evaluations of Indigenous programs and policies in all states and territories across Australia and, increasingly, internationally.

The information provided in this submission is based on Ninti One's multiple roles in research projects that have focussed on evaluation as the research topic; used evaluation approaches and methods; and provided recommendations to improve evaluation approaches. We have led projects to evaluate programs and facilitated national discussions with Aboriginal and Torres Strait Islander people and non-Indigenous stakeholders that have discussed evaluation and/or made recommendations that relate to evaluation.

More information about our projects can be found at [www.nintione.com.au](http://www.nintione.com.au)

Ninti One strongly supports the objective of the Draft IES. The Draft IES presents an achievable plan through the articulation of the guiding principles - that evaluations be credible, useful, ethical and transparent. The information in the longer draft background report is very comprehensive, with the shorter draft guide and draft strategy reports providing a condensed and accessible account of the rationale.

In the following section we provide commentary on specific aspects of the primary documents, and *Background Paper* where appropriate, which we believe warrant further consideration/inclusion in the final Strategy and Guide.

## **1. Principles**

### ***Centring Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges***

Ninti One particularly welcomes the central principle of the Draft IES which states that Aboriginal and Torres Strait Islander perspectives, priorities and knowledges must be at the centre of the evaluation of policies and programs. We have found that some of the most effective evaluations that we have been involved in, are those that are identified and paid for by the Aboriginal and Torres

Strait Islander organisations themselves e.g. Ninti was recently contracted by the Warlpiri Education and Training Trust to evaluate its program, at their own expense.

The efficacy of the IES is bound to the principle of centring Aboriginal and Torres Strait Islander people perspectives, priorities and knowledges. However, we suggest that it ought to be clearly acknowledged within the documents that there is no one single Indigenous perspective, and that these perspectives, as well as priorities can vary within locations. A diversity of Indigenous voices, at all stages, including interpretation of the results, will add robustness and rigour.

The IES states that Aboriginal and Torres Strait Islander people should have the option of being partners in all stages of evaluation. The default starting point for every evaluation should be that Aboriginal and/or Torres Strait Islander people lead and participate in evaluation teams. This is fundamental to the effectiveness of evaluations, as demonstrated in the 76 National Indigenous Australians Agency (NIAA) Grant Activity Reviews (GARs) that Ninti One has undertaken, all of which have been Indigenous led. The IES would benefit by stating this clearly and explicitly.

### ***Usefulness***

Usefulness' is identified as one of the key principles. There are so many elements that contribute to 'useful' evaluation. One that is mentioned, and could be strengthened, is the review and synthesis of existing evidence from a set of evaluations/reviews on a theme. So often individual evaluation information is siloed, and the opportunity to build a coherent broader picture is missed. We would refer to this sort of exercise as a *meta-evaluation* – not only does a meta-evaluation aggregate findings, it also assesses the quality of the evaluations themselves. A good meta-evaluation can be very powerful and has the critical mass to impact on policy that individual evaluations often do not.

## **2. An evaluation champion to oversee the Strategy**

We support the establishment of the Office of Indigenous Policy Evaluation (OIPE), to provide guidance to agencies on conducting evaluation in line with the principles of the Indigenous Evaluation Strategy. Learnings could be gained from the Department of Foreign Affairs and Trade, who established the Office for Development Effectiveness (ODE) to evaluate the performance of the Australian aid program, in 2006. Ninti One is currently undertaking work for the ODE in the Asia/Pacific region.

The proposed OIPE will require investment in time and funding to develop and maintain a strong understanding of what is happening across all elements of government. However, as noted in the IES documents, the Australian Public Service (APS), in general, has an evolving evaluation culture and growing Indigenous evaluation expertise. Agencies would require increases in their investment in evaluation practices and evaluation skills. The imperative for such investment is occurring at a time of increasing budgetary pressure. There is a real risk that the resourcing will be insufficient to drive the dynamic directions of the IES.

*'Behavioural change only comes when people have skin in the game through some measure of accountability or responsibility for the outcomes of their actions'* (p. 23). These words address a key issue – the strategy and guide are all very well, but unless government agencies are held accountable for their commitment to evaluation and the findings that arise, then change will be limited. The IES does not specifically describe how the proposed OIPE will drive this accountability.

For the OIPE to have influence, it is critical that the Office is fully informed on both Government Priorities and Indigenous Priorities. For the later, a formal engagement process with the National Co-

design Group for an Indigenous Voice, led by Ninti One Chair, Professor Tom Calma, would be of benefit.

### **3. Evaluation Methodology**

The *Draft Background Paper* discusses, in detail, many types of evaluation. At a higher level it does not differentiate between evaluation, research, and review. Making a distinction between these approaches is worthwhile as they each have a very particular and important role to play in learning more about what works and what does not work. By way of example, the NIAA Grant Activity Reviews (GARs) are not evaluations, but they have the potential to be valuable learning opportunities. Universities/research centres conduct a variety of valuable research in and with Aboriginal and Torres Strait Islander communities. Integrating the learning from evaluations, research and reviews represents a significant opportunity.

A *Value for Money* (VfM) approach is not mentioned in the *Draft Background Paper*. The body-of-knowledge in this space is growing<sup>1</sup>, given the potential challenges and limitations of ‘economic evaluation’ approaches such as *cost benefit analysis* and *cost effectiveness analysis*. VfM looks at both ‘tangible’ outputs and outcomes that can be measured in dollar terms and ‘intangible’ that cannot and should not be measured in dollar terms. The data is then synthesised to provide an overall VfM assessment. Like any evaluation methodology, VfM will not always be appropriate. But there are likely to be many circumstances in evaluation of Indigenous programs and services where VfM may provide a richer, more holistic view of program effectiveness and should be considered as part of the IES.

Overall, the Draft IES and Guide appear to privilege certain methodological approaches. The IES should make explicit the need for agencies to very carefully align the most appropriate evaluation methodology with the purpose of that evaluation.

### **4. Building capability to conduct and manage high-quality evaluations**

The recommendation that agencies implement an *Indigenous Evaluation Threshold Assessment* when new policies and programs are introduced and likely to impact on Aboriginal and Torres Strait Islander communities, is of benefit. However, creating an environment where this happens on a regular basis across government will present a capacity development challenge. Designing a program or policy to maximise its ‘evaluability’ requires that those doing the design have a strong grasp of the principles of evaluation.

Accessing data to underpin the development of baselines to evaluation processes is a significant issue. Several ongoing challenges remain in the establishment of baseline data such as: data quality of small area data; consistency between data sets due to varying administrative areas captured within geospatial boundaries; access to administrative data and lack of comprehensive sets of regional service and program investment data. Specific additional challenges that Ninti One has recently encountered, in terms of data quality and access, include difficulty accessing accurate information on Year 12 attainment, absence of data relating to culture and language, lack of access to data held by State and Territory agencies and generally poor quality of remote area education data.

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<sup>1</sup> King, J. and OPM (2018) *The OPM approach to assessing value for money: A guide*. Oxford: Oxford Policy Management Ltd.

The Productivity Commission's *Expenditure on Children in the Northern Territory Study Report* (April 2020) similarly called for better, more transparent data to be shared at the community level.

Building statistical literacy is a key issue at a regional and remote level. Indigenous organisations have indicated that access to data and understanding how to analyse and communicate it, is an ongoing challenge. We would also suggest that governance of data needs to include principles that support Indigenous data sovereignty.

## **5. Enhancing the use of evaluations**

The IES addresses the issue of making the findings of evaluations widely available, to encourage greater learning and utilisation. This is a critical consideration, as evaluation findings very often have far less impact than they should. This section of the strategy would benefit from asserting 'transparency' all the way to the ultimate beneficiaries themselves – Aboriginal and Torres Strait Islander people in communities across Australia whose lives are the subject of much of the evaluation/research being done, but who are not always informed of the findings and outcomes.

Ninti One supports the publishing and public distribution of evaluation reports except when sensitive cultural information is included or if data privacy and confidentiality conditions cannot be assured.

## **Conclusion**

In summary, Ninti One considers that the Draft IES, if adopted by the Australian Government, would be an important step forward in the improving the lives of Aboriginal and Torres Strait Islander people. An Indigenous Evaluation Strategy will be most effective if the Australian Government, through the OIPE, is prepared to compel its departments and agencies to adopt and implement the recommendations of the Productivity Commission, and then to leverage States and Territories to do the same. There is much to be gained by embedding the strategy as a standard practice across departments and agencies.

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

Yours sincerely

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