

7 August 2020

Commissioner Romlie Mokak
Productivity Commission
Locked Bag 2, Collins St East
Melbourne VIC 8003

Dear Rom

Re: Submission to the Productivity Commission on the draft Indigenous Evaluation Strategy

The Lowitja Institute provides this submission to support the development of the Indigenous Evaluation Strategy and the work undertaken to date by the Productivity Commission. Evaluation of government programs and policies in Aboriginal and Torres Strait Islander affairs has been an enduring challenge for governments over many years. Despite years of targeted reforms, we are still yet to see significant benefits to the lives of Aboriginal and Torres Strait Islander peoples. This is in part because of a lack comprehensive evaluation practice embedded throughout the Australian Public Service (APS) and into the policy cycles of Aboriginal and Torres Strait Islander affairs.

It is critical for evaluation practice to change the way governments work and create value for Aboriginal and Torres Strait Islander peoples. Our research has found that this will require significant and systemic change¹. The successful implementation of the Indigenous Evaluation Strategy (the Strategy) has the potential to create a shift in practice for the APS from ad hoc policies and programs, implementation failure and reporting for reporting's sake to one of evidence, transparency, Aboriginal and Torres Strait Islander leadership and continuous quality improvement. Our view is that the Indigenous Evaluation Strategy sets out the right principles and the initial framework required to create systemic change in government evaluation practice.

Based on our review of the draft Indigenous Evaluation Strategy and the key points in our previous submission, the Lowitja Institute offers the following comments on centring Aboriginal and Torres Strait Islander peoples' knowledges, perspectives and priorities and the implementation of the Strategy for further consideration by the Commission.

Centring Aboriginal and Torres Strait Islander peoples, knowledges, perspectives and priorities and the development of Aboriginal and Torres Strait Islander led evaluation practice and skills

The Lowitja Institute strongly supports the core principle of the strategy to centre Aboriginal and Torres Strait Islander peoples, knowledges, perspectives and priorities. Evaluation needs to align with the aspirations of Aboriginal and Torres Strait Islander peoples so that it can lead to better

¹ Kelaher, M., Luke, J., Ferdinand, A., Chamravi, D., Ewen, S., & Paradies, Y. 2018, *An Evaluation Framework to Improve Aboriginal and Torres Strait Islander Health*, The Lowitja Institute, Melbourne.

designed policies and programs that serve to benefit Aboriginal and Torres Strait Islander peoples. In order to further embed this principle, the Lowitja Institute recommends:

Inclusion of Indigenous Data Sovereignty

We recommend that the Strategy and supporting Guide include principles of Indigenous Data Sovereignty. Many existing data and evaluation methods do not recognise or privilege Aboriginal and Torres Strait Islander knowledges or perspectives. Indigenous Data Sovereignty refers to Aboriginal and Torres Strait Islander people's rights to govern and own their own data, including its creation, collection and use². The *Maiam nayri Wingara Aboriginal and Torres Strait Islander Data Sovereignty Collective* defines the principles of Indigenous Data Sovereignty as the right of Aboriginal and Torres Strait Islander peoples to:

1. Exercise control of the data ecosystem including creation, development, stewardship, analysis, dissemination and infrastructure.
2. Data that is contextual and disaggregated.
3. Data that is relevant and empowers sustainable self-determination and effective self-governance.
4. Data structures that are accountable to Indigenous peoples and First Nations.
5. Data that is protective and respects individual and collective interests.

Inclusion of Indigenous data sovereignty heeds the calls of Aboriginal and Torres Strait Islander peoples and supports the core principle to centre Aboriginal and Torres Strait Islander peoples, knowledges, perspectives and priorities.

Inclusion of innovative and participatory evaluation methods

We know from research practice³ that the design, process and outcomes of evaluation will often reflect the lens of the evaluator. As such it is essential for evaluation methods put forward in the Strategy and the supporting Guide to not be defined by the worldviews of dominant culture and include information and examples of innovative and diverse evaluation methods. We believe there is a large body of different evaluation practices and good practice examples which could be emphasised in the Guide to further centre Aboriginal and Torres Strait Islander knowledges and perspectives. This includes community based evaluations and community based researchers, participatory action research, continuous quality improvement and localised, place based approaches.

Aboriginal and Torres Strait Islander evaluation workforce and capability development

Building the skills and capability of Aboriginal and Torres Strait Islander peoples in evaluation practice will be critical to fully realising the core principle of the Strategy. Research from the Lowitja Institute and The University of Melbourne found that questions have been raised about the utility, effectiveness and ethics of research and evaluation undertaken in Aboriginal and Torres

² Indigenous Data Sovereignty Principles. Mayi Kuwayu, The National Study of Aboriginal and Torres Strait Islander Wellbeing. Available: <https://mkstudy.com.au/indigenoussdatasovereigntyprinciples/>

³ Ewen, S., Ryan, T. & Platania-Phung, C. 2019, *Further Strengthening Research Capabilities: A review and analysis of the Aboriginal and Torres Strait Islander Health Researcher Workforce*, The Lowitja Institute, Melbourne.

Strait Islander health and recommended that training opportunities should be provided to support Aboriginal and Torres Strait Islander leadership in evaluation and participation in co-design⁴.

We recommend an additional component of the Strategy is developed to support Aboriginal and Torres Strait Islander evaluation practice, and the skills, knowledge and infrastructure required for community driven and housed evaluations. This could include a program for Indigenous evaluation capacity development for Aboriginal and Torres Strait Islander community controlled organisations so that Aboriginal and Torres Strait Islander perspectives and methods of evaluation can be further developed and embedded into government evaluation practice.

Investing in the capacity of community-controlled organisations to develop and house their own evaluation processes has the potential to look at models of evaluation that:

- inform localised decision making
- encourage localised (or community led) policy and program cycles
- increase social capital
- support meaningful partnerships and co-design processes
- facilitate community driven Knowledge Translation and Data Sovereignty.

Changing the way government works

Building a culture of evaluation across the APS will require concerted focus on building the capacity, and changing the practices of the APS to work in ways that support Aboriginal and Torres Strait Islander led evaluation. Implementation of the strategy, and its core principle requires a genuine shift in the way government agencies and departments operate and this will take significant effort to change current practices⁵.

Like what is outlined in the new National Agreement on Closing the Gap, we suggest further focus on reforming and building the capacity of government organisations for structural and systemic change to respond to the needs of Aboriginal and Torres Strait Islander peoples. We recommend that the Strategy highlights the transformational elements outlined in the new National Agreement, and required by the APS, to fundamentally change the way they work with Aboriginal and Torres Strait Islander peoples. These elements include:

- identifying and eliminating racism
- embedding cultural safety
- working in partnership with Aboriginal and Torres Strait Islander organisations, communities and people
- accountability and transparent funding allocations
- supporting Aboriginal and Torres Strait Islander cultures; and
- improving engagement with Aboriginal and Torres Strait Islander peoples so that we have a leadership role in decision making.

Embedding these elements, along with improved access to data, within evaluation practice will go a long way to building trust in evaluation and government processes from Aboriginal and

⁴ Kelaher, M., Luke, J., Ferdinand, A., Chamravi, D., Ewen, S., & Paradies, Y. 2018, *An Evaluation Framework to Improve Aboriginal and Torres Strait Islander Health*, The Lowitja Institute, Melbourne.

⁵ Productivity Commission 2013, *Better Indigenous Policies: The Role of Evaluation*, Roundtable Proceedings, Productivity Commission, Canberra

Torres Strait Islander peoples and being able to realise the full benefits of evaluation practice, as outlined in the Strategy.

Implementation of the Strategy

The history of efforts to embed evaluation into Australian Government practice in Aboriginal and Torres Strait Islander affairs shows that the implementation of the Strategy will be a key challenge.⁶ There are numerous models which have been tried in the past to create cultural change and accountability across the APS with no one way being a clear success. As such, we recommend that the focus of the Strategy includes a comprehensive implementation plan for how the Strategy will be embedded across government. The suggested maturity model goes some way towards this goal but it will need to be expanded considerably.

The recommendation to create the Office for Indigenous Policy Evaluation (OIPE) is likely to be controversial because it potentially creates another government body with little power and authority over other agencies to enforce the principles and practices outlined in the Strategy. Our view is that an Aboriginal and Torres Strait Islander governed body to drive the Strategy is important and, along with the Indigenous Evaluation Threshold Assessment (IETA), would form important components of a broader plan to embed the Strategy across government. As we put forward in our previous submission, we support establishing strong Aboriginal and Torres Strait Islander governance and advisory mechanisms to support the delivery of the Strategy. In addition to the OIPE and IETA, an approach to see the effective implementation of the Strategy could include:

- Establishment of agency level evaluation champions and communities of practice, as well as APS wide champions and communities of practice on Aboriginal and Torres Strait Islander evaluation.
- A formal program to build Aboriginal and Torres Strait Islander evaluation skills and practice
- A comprehensive professional development program to build evaluation capability and understanding throughout the APS, including Aboriginal and Torres Strait Islander approaches, methods and principles of evaluation.
- Formal agreement from agencies to implement the Strategy once it is finalised
- Ongoing, clear and transparent accountability mechanisms for agencies to demonstrate how they are implementing the Strategy
- A comprehensive Knowledge Translation plan for the Strategy to build awareness and begin to change practices across the APS.

In summary the Lowitja Institute supports the development of the Indigenous Evaluation Strategy and looks forward to working with the Productivity Commission and the Australian Government to support its implementation.

Yours sincerely

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CEO, Lowitja Institute

⁶ See for example the Strategic Review of Indigenous Expenditure (Department of Finance and Deregulation, 2010), Better Indigenous Policies: The Role of Evaluation (Productivity Commission, 2013), Australian National Audit Office Indigenous Advancement Strategy Performance Audit Report (2017), amongst others.