



Australian Government

National Mental Health Commission

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

Re: Submission to inquiry into the development of an Indigenous Evaluation Strategy

Dear Mr Mokak,

Thank you for the opportunity to make a submission to the Productivity Commission's inquiry into the development of a whole-of-government evaluation strategy for policies and programs affecting Indigenous Australians.

Please find attached the submission from the National Mental Health Commission to the inquiry. There is no confidential material presented.

Should you require clarification, or would like to discuss this submission in further detail, please contact Ms Catherine Brown

Yours sincerely,

Christine Morgan
Chief Executive Officer
Ex-Officio Commissioner

23 August 2019





Australian Government

National Mental Health Commission

Submission to the Productivity Commission’s inquiry into the development of an Indigenous Evaluation Strategy (August 2019)

Introduction

The National Mental Health Commission (Commission), established in 2012, has a national remit to provide insight, advice and evidence on ways to continuously improve Australia’s mental health and suicide prevention system, and act as a catalyst for change to achieve these improvements. The Commission takes a broad approach to assess the impact of mental health on individuals by looking at the social determinants of mental health which include education, housing, employment, justice, human services and social support. There are three main strands to the Commission’s work: monitoring and reporting on Australia’s mental health and suicide prevention systems; providing independent advice to government and the community; and acting as a catalyst for change.

The Commission welcomes the development of a whole-of-government evaluation strategy for policies and programs affecting Aboriginal and Torres Strait Islander Australians. The Commission has previously highlighted the need to embed a culture of evaluation as a core aspect of Commonwealth program design, including through funding evaluation as a specific element of implementation. The Commission considers that the development of a targeted Indigenous Evaluation Strategy has the potential to significantly improve the quality and outcomes of programs that serve Aboriginal and Torres Strait Islander peoples.

Objectives of the Indigenous Evaluation Strategy

The Commission considers that the core objective of the Indigenous Evaluation Strategy should be to drive the development of more effective policies, programs and services for Aboriginal and Torres Strait Islander peoples, through building a stronger evidence base for ‘what works’ (and what does not) and allowing these lessons to be shared more widely. The Commission also supports the proposal to align the objectives of the Strategy with the principles set out in the *United Nations Declaration on the Rights of Indigenous Peoples*, in particular its emphasis on Indigenous self-determination.

An additional objective of the Indigenous Evaluation Strategy could be to ensure that evaluation becomes standard practice in the design and delivery of policies, programs and services for Aboriginal and Torres Strait Islander peoples. The Commission endorses the approach outlined in the *Issues Paper* for this inquiry, which envisages evaluation becoming ‘embedded in the development and implementation Australian Government policies and programs affecting Aboriginal and Torres Strait Islander people’. In line with this approach, the Commission suggests that the Strategy could incorporate mechanisms to ensure adequate resourcing for evaluation activities.

The Commission welcomes the Productivity Commission’s approach of including mainstream services in the Indigenous Evaluation Strategy. Aboriginal and Torres Strait Islander peoples’ experiences with mainstream services are likely to differ significantly from the broader population, due to disparities in health and wellbeing status and specific barriers such as racism and lack of cultural safety.¹ Ensuring that these unique experiences are captured in evaluations of mainstream services could help to facilitate improvements in experiences and outcomes for Aboriginal and Torres Strait Islander peoples.



The Commission notes that there are a range of existing reporting and evaluation processes for Australian Government funded programs that may overlap with the Indigenous Evaluation Strategy. A further objective of the Strategy could be to consolidate these existing processes so as to streamline regulatory requirements for service providers, reduce duplication and allow for pooling of resources to conduct more effective evaluations.

Recommendation 1: The Commission recommends that the objectives of the Indigenous Evaluation Strategy should include:

- driving the development of more effective policies, programs and services for Aboriginal and Torres Strait Islander peoples through building the evidence base and sharing good practice***
- ensuring that evaluation becomes standard practice in the design and delivery of policies, programs and services for Aboriginal and Torres Strait Islander peoples***
- consolidating existing reporting and evaluation processes for policies, programs and services affecting Aboriginal and Torres Strait Islander peoples.***

Key principles

The Commission welcomes the acknowledgement in the *Issues Paper* of the importance of incorporating Indigenous knowledges, perspectives and priorities into evaluation planning and conduct. Engagement and participation of Aboriginal and Torres Strait Islander peoples at all stages of the evaluation process should be a core principle underpinning the Indigenous Evaluation Strategy.

The Commission recommends that the Strategy incorporate engagement with people directly affected by a policy, program or service as a core principle of evaluation. This principle would encourage an approach to evaluation that moves beyond a simple focus on inputs and outputs, to a focus on experiences and outcomes. This approach would provide a deeper and more nuanced understanding of the impacts of policies, programs and services on the communities that are affected by them, and of the factors that drive positive outcomes.

The Commission recommends that the Strategy incorporate the principles of co-design and co-production. A co-design process engages people who will be directly affected by a policy, program or service in the process of planning and designing that program or service, to ensure that it will better meet their needs, expectations and requirements. Co-production is a process whereby the people directly affected by a policy, program or service work together with other stakeholders in an equal and reciprocal relationship, with shared power and responsibilities, to implement, deliver and evaluate the policy, program or service.^{2,3}

An Indigenous Evaluation Strategy that incorporates these principles would see Aboriginal and Torres Strait Islander peoples involved as partners and active participants at all stages of the evaluation process. Such an approach is essential to ensuring that evaluations are able to accurately determine whether policies, programs and services are meeting the needs and expectations of the communities they aim to assist.

The Commission proposes that the Indigenous Evaluation Strategy include a focus on social determinants as an overarching principle. Within a health context, a social determinants approach draws attention to the importance of the social conditions and systems that shape the conditions of daily life, and thereby strengthen or undermine health and wellbeing.⁴

A social determinants approach is likely to have particularly significance for Aboriginal and Torres Strait Islander peoples, for whom 'health' is inextricably linked to the broader concept of social and emotional wellbeing. This is a holistic concept that reflects the Aboriginal and Torres Strait Islander

understanding of health and recognises the importance of connection to land, culture, spirituality, ancestry, family and community and how these affect the individual.⁵

Adopting a social determinants approach would require evaluators to look beyond the policy, program or service being evaluated, to consider the broader factors that may influence the outcomes of that initiative. This approach could improve understanding of ‘what works’ by allowing evaluators to identify external factors that may bolster the success of particular initiatives or, conversely, hamper the effectiveness of otherwise well-designed programs.

Recommendation 2: The Commission recommends that the Indigenous Evaluation Strategy incorporate the following principles:

- engagement with people directly affected by the policy, program or service under evaluation***
- co-design and co-production***
- a social determinants approach, incorporating the concept of social and emotional wellbeing.***

Transparency and reporting

If (as proposed above) a key objective of the Indigenous Evaluation Strategy is to build a stronger evidence base for ‘what works’ and allow for sharing of good practice, it will be essential to ensure that the findings of evaluation processes are made widely available. The Commission considers that the Strategy should incorporate a presumption in favour of making the findings of evaluation processes publicly available.

The Commission recommends that the Indigenous Evaluation Strategy include a requirement that the findings of evaluation processes be clearly communicated to people affected by the policy, program or service under review, especially to those who participated in the evaluation process. This ‘feedback loop’ is an essential component of ethical research, and an important means of ensuring that those who design and implement policies, programs and services are accountable to the communities affected by these initiatives.

At the same time, the Commission agrees with the concerns outlined in the *Issues Paper* regarding circumstances in which it may not be appropriate or desirable to publish evaluation reports in full (such as where doing so could compromise confidentiality and privacy). The Commission supports the Productivity Commission’s suggested alternative of publishing a summary report in these cases, rather than the full report.

Recommendation 3: The Commission recommends that the Indigenous Evaluation Strategy incorporate:

- a presumption in favour of making the findings of evaluation processes publicly available, with caveats to protect confidentiality and privacy***
- a requirement that the findings of evaluation processes be clearly communicated to people affected by a policy, program or service.***

The Commission acknowledges the importance of ensuring fairness and accuracy in public reporting of evaluation findings. As noted in relation to the social determinants approach discussed above, a range of external factors may influence the outcomes of policies, programs and services in ways that are beyond the immediate control of individual providers. In these circumstances, service providers may understandably have concerns about the manner in which evaluation findings will be reported.

Ensuring that broader factors are highlighted in public reporting, in accordance with a social determinants approach, may help to alleviate these concerns. This approach to reporting would

have the added benefit of drawing attention to areas where further work is required to ensure that policies, programs and services are able to achieve their objectives.

Recommendation 4: The Commission recommends that the Productivity Commission consider options for ensuring fairness and accuracy in public reporting of evaluation findings.

Evaluation priorities

In line with the principles of co-design and co-production, the Commission considers that evaluation priorities should be driven by Aboriginal and Torres Strait Islander peoples themselves. As the stakeholders that have the most to gain (or lose) from the outcomes of evaluations under the Indigenous Evaluation Strategy, Aboriginal and Torres Strait Islander peoples should have a central role in determining evaluation priorities.

Recommendation 5: The Commission recommends that evaluation priorities under the Indigenous Evaluation Strategy be driven by Aboriginal and Torres Strait Islander peoples.

The Commission recommends that the Productivity Commission consult with Aboriginal and Torres Strait Islander stakeholders regarding whether the community-controlled sector should be considered a priority for evaluation. Available evidence suggests that programs and services delivered by community-controlled organisations can achieve significant positive outcomes for Indigenous peoples. For example, international studies have found that community-controlled models of health care are associated with improved health outcomes for Indigenous peoples.⁶

A larger and more robust body of evidence on the outcomes of community-controlled service provision, and the factors which lead to positive outcomes under this model, could help to facilitate the development of more effective policies, programs and services for Aboriginal and Torres Strait Islander peoples. The Commission emphasises, however, that the views of Aboriginal and Torres Strait Islander stakeholders should ultimately determine whether the community-controlled sector is considered a priority for evaluation.

Recommendation 6: The Commission recommends that the Productivity Commission consult with Aboriginal and Torres Strait Islander stakeholders regarding whether to prioritise programs and services delivered by the community-controlled sector for evaluation.

References

1. The Lowitja Institute. Journeys to healing and strong wellbeing: Final report. Melbourne; 2018. Available from: <https://www.lowitja.org.au/page/services/resources/Cultural-and-social-determinants/mental-health/journeys-to-healing-and-strong-wellbeing-final-report>.
2. Roper C, Grey F, Cadogan E. Co-production: Putting principles into practice in mental health contexts. 2018. Available from: https://recoverylibrary.unimelb.edu.au/_data/assets/pdf_file/0010/2659969/Coproduction_putting-principles-into-practice.pdf.
3. National Mental Health Consumer and Carer Forum. Advocacy brief: Co-design and co-production. 2017. Available from: https://nmhccf.org.au/sites/default/files/docs/nmhccf_-_co-design_and_co-production_ab_-_final_-_october_2017_0.pdf.
4. Australian Institute of Health and Welfare. Australia's health 2018. Australia's health series no. 16. US 221. Canberra: AIHW; 2018. Available from: <https://www.aihw.gov.au/getmedia/7c42913d-295f-4bc9-9c24-4e44eff4a04a/aihw-aus-221.pdf.aspx?inline=true>.

5. National Mental Health Commission. Contributing lives, thriving communities: Report of the national review of mental health programmes and services. Sydney: NMHC; 2014. Available from: www.mentalhealthcommission.gov.au/our-reports/contributing-lives,-thriving-communities-review-of-mental-health-programmes-and-services.aspx.
6. Campbell MA, Hunt J, Scrimgeour DJ, Davey M, Jones V. Contribution of Aboriginal Community-Controlled Health Services to improving Aboriginal health: an evidence review. Australian Health Review. 2018;42:218–26.