

Productivity Commission Draft Indigenous Evaluation Strategy

Submission by KALACC and CDN

1. Response to the draft Indigenous Evaluation Strategy
2. KALACC and CDN Recommendation



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1. Response to the draft Indigenous Evaluation Strategy

We read with great interest the draft Indigenous Evaluation Strategy. KALACC and CDN have joined in a response through this submission as we share common ground on what an evaluation strategy should entail, and we want to place our current work into your information gathering process.

CDN is a not-for-profit cultural research and policy company based in Melbourne, and KALACC is a culture and language centre established and led by Aboriginal people in the Kimberley.

We welcome the Productivity Commission's publication of a draft Indigenous Evaluation Strategy and its emphasis on the need for robust evaluation to understand the effectiveness of policies and programs and support policy development that is evidence based. We share the position that any credible evaluation framework is predicated on the clear articulation of the goal and objective of any program. Therefore, a framework should account for and capture both the planning and the evaluation at the same time.

KALACC notes that the objective of the Indigenous Evaluation Strategy is "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."¹ As the draft Indigenous Evaluation Strategy rightly notes:

*The historic Partnership Agreement on Closing the Gap sees Aboriginal and Torres Strait Islander representatives sitting at the table with ministers from all Australian governments. The Agreement 'embodies the belief of all its signatories that shared decision making with Aboriginal and Torres Strait Islander community controlled representatives in the design, implementation and monitoring of the Closing the Gap framework is essential to achieve their shared goal to close the gap in life outcomes between Indigenous and non-Indigenous Australians'*²

In 2020, there has been an undertaking to pivot towards strengths-based agendas and for the first time Aboriginal culture is being an enabler of good social outcomes, rather than as a barrier to achieving these desired improvements. A fundamental issue for the Productivity Commission to consider is what are the structures, processes, and methods by which the new strengths-based policies of Government can be robustly evaluated?

In January 2020 the Social Justice Commissioner, June Oscar wrote:

*It is hard to pick one issue to "fix" because the issues we face do not occur in isolation, they are systemic and intersecting. At their foundation, these issues are symptoms of a lack of recognition of Aboriginal and Torres Strait Islander peoples' equal place, worth and voice in the fabric of this nation.*³

This point summarises the key threshold issue for the Indigenous Evaluation Strategy, the recognition that Indigenous Australians have an existing knowledge that is ignored at best and in most cases, actively worked against. The Commissioner went on to say.

For too long there has been denial about Indigenous society, knowledge systems and our existence in Australia before European arrival. The continuation of this legacy of denial is why we continue to experience marginalisation, and structural and systemic discrimination at all levels across different sectors in our own country.

The 'Report on engagements with Aboriginal and Torres Strait Islander people to inform a new

¹ Productivity Commission (2020). *Indigenous Evaluation Strategy Draft*. Australian Government. P. 6

² Joint Council on Closing the Gap. (2019). *Partnership agreement on Closing the Gap 2019-2029*, Council of Australian Governments, Canberra. Cited in Productivity Commission (2020). *Indigenous Evaluation Strategy Draft*. Australian Government. P. 4

³ Oscar, J. (2020, January 31). June Oscar's 2020 vision: Reaching our potential as a nation begins with truth telling. *The Guardian*. <https://www.theguardian.com/australia-news/2020/jan/31/june-oscar-2020s-vision-reaching-our-potential-as-a-nation-begins-with-truth-telling>

National Agreement on Closing the Gap' was published by the Coalition of Peaks on 24 June 2020. The 3rd Joint Council meeting on Closing the Gap was held on Friday 03 July, at Parliament House in Canberra, endorsed that recent community engagement report and endorsed the four **Priority Policy Areas**:⁴

1. Developing and strengthening structures to ensure the full involvement of Aboriginal and Torres Strait Islander peoples in shared decision making at the national, state, and local or regional level and embedding their ownership, responsibility, and expertise to close the gap
2. Building the formal Aboriginal and Torres Strait Islander community-controlled services sector to deliver closing the gap services and programs in agreed focus areas
3. Ensuring all mainstream government agencies and institutions undertake systemic and structural transformation to contribute to Closing the Gap, improve accountability and respond to the needs of Aboriginal and Torres Strait Islander people
4. Ensuring Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to monitor the implementation of the Priority Reforms, the closing the gap targets and drive local priorities.⁵

Accountability, evidence, and locally relevant data are all key elements of this new National Agreement on Closing the Gap.

In addition, priority was given to *seven policy areas* and a focus on addressing *systemic racism* remaining after two centuries.

Priority Policy Areas

Priority 1: Families, children, and youth.

Priority 2: Health.

Priority 3: Education.

Priority 4: Economic Development.

Priority 5: Housing.

Priority 6: Justice, including youth justice.

Priority 7: Land and waters.

Cross System Priority

Addressing racism, discrimination and social inclusion, healing and trauma, and the promotion of cultures and languages for Aboriginal and Torres Strait Islander people

2020 Closing the Gap in Partnership Targets

These priority areas have been activated by the nomination of 16 Closing the Gap targets announced by the Prime Minister on 30 July 2020.

1. Close the Gap in life expectancy within a generation, by 2031
2. By 2031, increase the proportion of Aboriginal and Torres Strait Islander babies with a healthy birthweight to 91 per cent
3. By 2025, increase the proportion of Aboriginal and Torres Strait Islander children enrolled in Year Before Fulltime Schooling (YBFS) early childhood education to 95 per cent
4. By 2031, increase the proportion of Aboriginal and Torres Strait Islander children

⁴ Joint Council meeting (2020). *Communique from the 03 July 2020 meeting*. <https://closingthegap.niaa.gov.au/sites/default/files/files/joint-council-communique-20200703.pdf>

⁵ Closing the Gap Partnership (2020), *Priority Reforms*, <https://www.closingthegap.gov.au/priority-reforms>

- assessed as developmentally on track in all five domains of the Australian Early Development Census (AEDC) to 55 per cent
5. By 2031, increase the proportion of Aboriginal and Torres Strait Islander people (age 20-24) attaining year 12 or equivalent qualification to 96 per cent
 6. By 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25-34 years who have completed a tertiary qualification (Certificate III and above) to 70 per cent
 7. By 2031, increase the proportion of Aboriginal and Torres Strait Islander youth (15–24 years) who are in employment, education or training to 67 per cent
 8. By 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25–64 who are employed to 62 per cent
 9. By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88 per cent
 10. By 2031, reduce the rate of Aboriginal and Torres Strait Islander adults held in incarceration by at least 15 per cent
 11. By 2031, reduce the rate of Aboriginal and Torres Strait Islander young people (10-17 years) in detention by at least 15 per cent
 12. By 2031, reduce the rate of over-representation of Aboriginal and Torres Strait Islander children in out-of-home care by 45 per cent
 13. A significant and sustained reduction in violence and abuse against Aboriginal and Torres Strait Islander women and children towards zero
 14. Significant and sustained reduction in suicide of Aboriginal and Torres Strait Islander people towards zero
 15. a) By 2030, a 15 per cent increase in Australia's landmass subject to Aboriginal and Torres Strait Islander people's legal rights or interests
b) By 2030, a 15 per cent increase in areas covered by Aboriginal and Torres Strait Islander people's legal rights or interests in the sea
 16. By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander languages being spoken

With the priority areas agreed, and a set of 16 output targets identified, KALACC and the Cultural Development Network strongly suggest to the Productivity Commission that there is merit in preparing to trial and pilot credible and proven evaluation strategies nominated by Indigenous communities now. By initiating small trials of these methods, parallel to the formation of an over-arching strategy, can provide vital practice knowledge from Indigenous communities that address the priority areas and can contribute to the insights and evidence needed to “close the gap”, before the ink sets on the strategy.

The centrality of Culture

The centrality of culture as a planning principle has brought KALACC and CDN together informally to explore the causal relationship between cultural activities and their outcomes impacting on social and economic outcomes for communities.

In a recent Video Conference presentation by the Productivity Commission, Romlie Mokak answered a question from KALACC about the role of culture within the evaluation agenda and acknowledged this was work carried out by the Lowitja Institute during his time there.

IN 2020, Professor Kerry Arabena released a landmark report '*... Country Can't Hear English...*' – *A guide to implementing cultural determinants*⁶ which detailed the connection

⁶ Arabena K. (2020) '*... Country Can't Hear English...*' – *A guide to implementing cultural determinants*

between cultural determinants and health for Indigenous communities.

KALACC is a member of the Kimberley Suicide Prevention Trial and in correspondence prior to the announced Closing the Gap in Partnership targets, the Department of Health advised us as follows:

*A new National Agreement on Closing the Gap is close to being agreed between jurisdictions and Aboriginal and Torres Strait Islander leaders. The Agreement will set out priorities for the next ten years, and outline targets and measures that will enable Aboriginal and Torres Strait Islander peoples to forge their own pathways through community-led, place-based solutions that engage Aboriginal and Torres Strait Islander peoples to pursue their own visions. Work is also underway to align the National Aboriginal and Torres Strait Islander Health Plan and Implementation Plan with the new Closing the Gap framework, **and to embed the cultural determinants and social determinants of health across health policy approaches.***

This intention to embed cultural determinants will need to be an additional focus for *The Closing the Gap in Partnership* targets. While not explicit, they can be directly associated with three of the targets,

#11 - Young people are not overrepresented in the criminal justice

#14 - People enjoy high levels of social and emotional wellbeing

#16 - Cultures and languages are strong, supported and flourishing

CDN's work to date indicates that outcomes that can be achieved through cultural engagement can impact across all 16 of the targets. In the announcement of the targets on 30 July, we note that the proposal included the opportunity to add four more targets over the life of the agreement.

KALACC and CDN urge the Productivity Commission to include in their response to the Treasurer, that the Commonwealth aim for the inclusion of cultural targets that are meaningful to, and are determined by, Aboriginal and Torres Strait Islander people to the Closing the Gap in Partnership.

2. KALACC and CDN Recommendation

Given that *evaluation* is best introduced at the start of the policy development cycle, now is absolutely the best opportunity for the Government to give consideration to a practical trial on planning and evaluation put forward below, in this current document by KALACC and CDN.

KALACC has been at the forefront in championing culture as the foundation for improving lives of Aboriginal and Torres Strait Islanders, and in a separate strand of work, CDN has led the research and development of useful frameworks for improving and measuring outcomes of engaging in cultural activities.

This submission endorses the draft evaluation strategy and recommends that the Productivity Commission include a practical field trial with communities to understand how an evaluation strategy centred on Indigenous learning can be applied. This would be a small additional piece of work but would bolster the report back to the Government with a documented case-study demonstrating the application of the principles outlined in the draft.

CDN's proposal to run a planning and evaluation case-study with KALACC is informed by extensive research and experience in cultural development policy that takes an evidence based and outcomes focussed approach. Based at RMIT University, CDN is an independent not for profit company which for 15 years has led research into the outcomes of engaging in cultural activities. This research has led to the development of a planning and evaluation framework which places culture at the centre and led to the development of an online tool that enables communities and organisations to plan for outcomes, evaluate their success in achieving outcomes and reflect on their activities as a learning culture.

In this proposal, we provide an example, on how the goal and the guiding principles of the draft are present in a radically new method that draws on the latest cloud-based technology and is named the WhiteBox Outcomes Planning Platform. WhiteBox is a reference to the 'Black Box' flight recorder that was first invented in Australia and has ensured the safety and growth of the aviation industry since the 1960s. We use a "flight recorder" model to collect the key data in a consistent manner for understanding our journeys and making incremental improvements based on evidence. It is the best practice of an organisation, a government or a community that nurtures a learning culture and seeks to know what it does not know.

We draw the Productivity Commission attention to this work as we seek opportunities to test the planning and evaluation frameworks in community and on Country and make the findings and practice available to the Commission and any future agency that takes on the Indigenous Evaluation Strategy. This new way of connecting policy outcomes and community outcomes is being trialled now and can also be implemented and tested in the context of *Closing the Gap in Partnership* targets.

CDN's planning and evaluation method recognises the guiding principles of the Productivity Commission Evaluation Strategy in the following way.

The Goal: Improving lives of Aboriginal and Torres Strait Islander people

The Process: Centring Aboriginal and Torres Strait Islander people, perspectives, priorities, and knowledges

Principles

Credible: The measurable outcomes schema researched and developed by CDN aims to provide policy writers with the consistent language and method that provides credibility, consistency, aggregate data, and benchmark data, in real-time. CDN's frameworks have been endorsed locally by the National Local Government Cultural Forum (operating 2013-2018) and Internationally with the signing of a memorandum of understanding between CDN and UCLG (United Cities and Local Government), who note that culturally relevant policies and programs are central to sustainable development and relevant to indigenous communities in other countries. The breakthrough five measurable outcomes of engagement in cultural activities has been expanded on and detailed in a journal article that has been peer-reviewed and accepted for publication in the international journal, *Evaluation*.

Useful: The 15 years of research and publication has led CDN to focus the past five years on applying the framework to being useful in the field and it started trials on paper with local governments, cultural institutions, and cultural producers in 2017. The success of these trials led to CDN partnering with group of cities and cultural producers to invest in the development of the method as an on-line activity building, planning and evaluation service that records a complete narrative in real-time for easy monitoring and understanding between remote and distant communities.

Ethical: The WB method is intended for use by communities and community leaders at the frontline and at the same time through a central office. The method is neutral and the shape of the activity, its intentions, activities, participants, and evaluation are driven by the community. This recognises not only that the community has the best understanding of what the outcomes should be, but also how to get there. By using WB, the learning is managed and owned by the community and that leadership. This is a critical difference to current evaluation methods that are led by third-party, external experts, and not connected to an agreed structure of inputs, outputs and outcomes that is embedded in the method.

Transparent: All perspectives on the policy process are open to the users of WhiteBox. For policy makers in central government, they can track the activities and monitor the outcomes in real time. For agencies with relationships to communities they are reporting to central government and monitoring progress as required by good governance of public funds, but they do not determine the activities, this is the realm of the community leadership and individuals delivering programs and activities. For the community they have full access to their data, their practice knowledge and they determine how deep the sharing of that

knowledge goes and with whom.

We note as follows on page four of *A Guide to Evaluation Under the Indigenous Evaluation Strategy*

Evaluation is most effective when it is planned for early and when it is integrated into each stage of policy and program design — from setting policy objectives through to using evaluation findings to inform future policies and programs. Further, in the context of policies and programs covered by the Strategy, it is critical that Aboriginal and Torres Strait Islander people, perspectives, priorities and knowledges be carefully considered at each of these stages.

Figure 2 of the Guide shows the four principles of evaluation from *early planning and design, implementation, completion, and need for change identified*. The text goes on to say:

Before a policy or program is implemented, evaluation should inform policy design. While a policy or program is being implemented, evaluation should inform thinking on ways to improve the policy or program. And after the policy or program has been implemented, evaluation can provide evidence on outcomes and impacts that can be drawn on to inform future policies and programs.

At the heart of CDN's work is the knowledge that culture is a domain of public policy in its own right⁷ and is a manifestation of a community's values, and therefore, should be a consideration in any publicly funded activity. Culture is central to WhiteBox as culture is at the heart of any long-term change in the community. It sits alongside economic, social, and environmental domains of policy that the Productivity Commission already works within.

When introducing the draft Indigenous Evaluation Strategy, the Chair of the Productivity Commission, Michael Brennan, stated the Commission has "*also learnt a great deal about the importance of Indigenous cultures, and approaches and knowledges in policy making.*"⁸

Drawing on its research, development, and practice CDN has developed three key frameworks (The Schema of Measurable Outcomes, The Framework for Cultural Development Planning and the Schema of Inputs and Outputs of Cultural Activity.) These three key pieces of research have been incorporated into WhiteBox that has the potential to do for the cultural sector what the Black Box flight recorder did for aviation. That is to record the entire narrative of an activity from goal to the outcome and reflection and is shared at all levels of governance.

The WhiteBox method aligns with *Closing the Gap in Partnership* statement of four outcomes:

- a. Shared decision-making:** Aboriginal and Torres Strait Islander people are empowered to share decision-making authority with governments to accelerate policy and place-based progress on Closing the Gap through formal partnership arrangements.
- b. Building the community-controlled sector:** There is a strong and sustainable Aboriginal and Torres Strait Islander community-controlled sector delivering high quality services to meet the needs of Aboriginal and Torres Strait Islander people across the country.
- c. Improving mainstream institutions:** Governments, their organisations and their institutions are accountable for Closing the Gap and are culturally safe and responsive to the needs of Aboriginal and Torres Strait Islander people, including through the services they fund.
- d. Aboriginal and Torres Strait Islander-led data:** Aboriginal and Torres Strait Islander people have access to, and the capability to use, locally relevant data and information to set.

⁷ Hawkes, J. (2001) *The Fourth Pillar of Sustainability: culture's essential role in public planning*. Melbourne, CDN

⁸ Productivity Commission (2020), Video introduction to the *Indigenous Evaluation Strategy Draft*. https://www.youtube.com/watch?v=r_S0LYk9cPA

WhiteBox is a 'policy recorder' and is based in the principle that for evaluation to be useful, it needs to capture and consider the objective of the activity (the intended outcome) and what happened to reach an actual outcome. The method requires organisations to identify and share the community goal and the outcomes required to achieve this goal. Research and local knowledge are utilised to understand how outcomes can be achieved and a program logic is devised and delivered locally. The process is simple, led on-line and allows communities to design and own their own strategies based on their own local knowledge and values.

A key innovation of WhiteBox is the identification of a set of cultural outcomes along with the methods to evaluate their attainment. While cultural activities are often used to achieve outcomes in other domains such as the social or economic domains they have rarely been included in evaluation. Putting culture at the centre of planning and evaluation allows communities to develop responses that accord to their own values and provides important insight into how change is achieved. Results from current trials indicate that in the achievement of outcomes the cultural outcome is often a causal factor in the achievement of outcomes in other domains of public policy such as economy, social, environment and governance.

In WhiteBox, activities are evaluated according to the objectives identified at the start of the planning stage enabling those who planned and implemented the activity to understand if the activity was successful in its intentions. Evaluation is conducted by those implementing the activity *without* recourse to outside expertise and significant additional cost. Communities become the champions of their own evaluation and manage how it is conducted accounting for the activity, participants, and local situation and WhiteBox guides them through that process. The collection of qualitative and quantitative information facilitates an understanding of the extent that the objectives have been met and identifies factors that contributed or hindered the participant outcomes. With communities undertaking the whole process themselves, and with the process itself being both systematic and repeatable, it ensures that the activity and its evaluation is rooted in the community's perspective and useful. The communities themselves are the first to learn about the outcomes of their own activities and thus, builds skills within the community.

This independence of design and delivery is balanced by connection through the cloud based WhiteBox service to central agencies who have an important governance and monitoring role. The knowledge that is made available to these departments and agencies, in the voice of the community, from the direction of the community, allows incremental learning to happen at a departmental and policy level, where the funding and resource decisions are made. This is also where other public policy decisions can impact on the cultural outcomes, and therefore the social and economic outcomes of Indigenous communities. WhiteBox allows the knowledge of the community to influence the policy decisions that impact on the community.

WhiteBox has been in development since 2015, evolving from a proof of concept stage, prototyping, field trials and was launched with the City of Perth in May 2019 and expanded in its development with another 14 organisations including arts and cultural producers and different communities in Victoria, Western Australia and New South Wales.

Building on current capabilities and opportunity

KALACC and CDN understand that the Productivity Commission is not an evaluation commissioning entity and that the strategy is for Government agencies to undertake robust evaluations of their own programs. However, as the Productivity Commission is drafting the Indigenous Evaluation Strategy there is an expectation that it will lead to evaluations by Government agencies to be *consistent and systematic*, with a whole of government approach. Therefore, the Commission is likely to have a role for some time until there is another agency tasked with this oversight.

We also understand that the Productivity Commission is engaged in discussions with several Government agencies and that frequent discussions would take place between the Productivity Commission and the National Indigenous Australians Agency and the

Commonwealth Department of Health. The Department of Health is about to embark on a new 10-year cycle which relates to the Social and Cultural Determinants of Health. This major and macro policy area intersects with the priorities of the Interim Government Wide Evaluation, of *Priority Policy Areas*, *Cross System Priority*, and *Priority Reform Areas*.

This joint submission endorses the framework of the Indigenous Evaluation Strategy and informs the Productivity Commission that much of this structure and guiding principles are already in existing frameworks. Many of the submissions will endorse those frameworks and will align to many evaluation methods.

The WhiteBox method is the only method that can encompass all the principles identified by the Productivity Commission draft Indigenous Evaluation Strategy, and the *Closing the Gap in Partnership*, and is already present in an accessible technical solution currently being trialled by local governments and communities in Australia today.

The role of *culture* in policy setting is an increasing area of study and will form part of ongoing whole of population and general policy level study by organisations such as AIATSIS, Lowitja Institute and ANU, whereas in KALACC there is an opportunity to be trialing evaluations on the ground and in community through the cultural perspective.

We endorse the draft Indigenous Evaluation Strategy and recommend that as the same time as the responses are being reported back to the Treasurer, a branch-off from this process can be implemented to build a case-study of how these guiding principles are applied on Country. This acknowledges the Productivity Commission and the Joint Council's aim for Indigenous led solutions.

The principles of the draft strategy are in place with CDN's methods, and a manageable case study can be implemented with the Kimberley communities, led initially through KALACC. This would provide an observable end-to-end case-study that will assist the government departments understand how their policy goals can be addressed by encompassing Indigenous cultures and led at the community level.
