



**Submission to the Productivity Commission**  
**Issues Paper June 2019 – Indigenous Evaluation**  
**Strategy**

CONGRESS OF ABORIGINAL AND TORRES STRAIT ISLANDER NURSES AND MIDWIVES

Level 1, 15 Lancaster Place, Majura Park 2609 | Phone: 02 6262 5761 | Email: [admin@catsinam.org.au](mailto:admin@catsinam.org.au) | Web: [catsinam.org.au](http://catsinam.org.au)

*Unity and Strength through Caring*

## Introduction

CATSINaM welcomes the opportunity to make a submission to the Productivity Commission's Issues Paper June 2019 – Indigenous Evaluation Strategy.

CATSINaM was established in 1998 with a primary role to represent, advocate and support Aboriginal and Torres Strait Islander nurses and midwives at a national level. Aboriginal and Torres Strait Islander health professionals play a critical role in the delivery of improved social and emotional wellbeing outcomes for all Australians.

CATSINaM is also a leader of health system reform in that CATSINaM supports cultural safety training which has applicability to national health standard setting for quality and safe care; national workforce training curriculum; and at the fundamental level, improves access to health care by Aboriginal and Torres Strait Islander people.

Primary care access and continuity of care which include co-ordinated and planned care within the interface of tertiary and community sectors is of high importance in addressing the population level social capital of Aboriginal and Torres Strait Islander people.

There are approximately 4,176 (1%) Aboriginal or Torres Strait Islander nurses and midwives among the 379,700 nurses and midwives registered in Australia.<sup>1</sup> Our General position towards the recruitment and retention of Aboriginal and Torres Strait Islander peoples into nursing are:

- ⑥ participation of Aboriginal and Torres Strait Islander peoples in the nursing and midwifery workforce is an essential element in closing the life expectancy gap for Aboriginal and Torres Strait Islander peoples within a generation; and

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<sup>1</sup> See : <https://www.aihw.gov.au/reports/workforce/nursing-and-midwifery-workforce-2015/contents/who-are-nurses-and-midwives> Nursing and Midwifery Workforce 2015, AIHW, Cat No: WEB 141, pp 1-7.

See also, *Choosing a nursing career: Building an Indigenous nursing workforce*, Derawin, L., Francis, K., Anderson, J., Journal of Hospital Administration, 2017 Vol 6 No 5.

- ⑥ affirmative action by industry leaders, employers and other key stakeholders to increase the proportion of Aboriginal and Torres Strait Islander people is required to counter the inherent bias within recruitment processes within currently in the nursing employment practices.
- ⑥ The functions of Aboriginal and Torres Strait Islander nurses and midwives are too often overlooked or downplayed at the health systems level in favour of medical care access, which in large part results in little benefit to the Aboriginal and Torres Strait Islander person because it pays least attention to the social and cultural determinants of health.

In this context CATSINaM has a role in advising the Commonwealth government on matters which respond to the causes and disproportionate impact of poverty on Aboriginal and Torres Strait Islander peoples.

### **CATSINaM members' submission:**

- ⑥ highlights the body of existing evidence on the causes of poverty in Aboriginal and Torres Strait Islander communities;
- ⑥ advocates for a social and cultural determinants of health approach which alleviates the impact of poverty and increases education and employment roles with Aboriginal and Torres Strait Islander people; and
- ⑥ increases public awareness of the ways that funding in Aboriginal Affairs is applied to address social hardship.

## We submit the following comments against the consultation questions:

### Questions on Objectives

*What objectives should a strategy for evaluating policies and programs affecting Aboriginal and Torres Strait Islander people seek to achieve?*

*To what extent are the evaluation practices of Australian Government agencies consistent with the United National Declaration on the Rights of Indigenous Peoples? How could practices be improved in this respect?*

- ④ CATSINaM members' do not support a strategy for evaluating policies and programs for Aboriginal and Torres Strait Islander people for two reasons:
  1. Quality monitoring is not engagement; and
  2. Evaluation as an activity, has no impact on the problems caused by poverty.
- ④ The strategy therefore needs to be focussed on reducing the cost of administration of programs so that these saving may be applied to on the ground health, nutrition, alcohol education and rehabilitation and land care programs.
- ④ The 'rights' outlined in the United Nations Declaration on the Indigenous Peoples which have been identified as having impact on the proposed Evaluation Strategy, see page 3 of Issues Paper, have questionable relevance to quality monitoring.
- ④ In this context CATSINaM members submit that overlaying an Evaluation Strategy on programs for Aboriginal and Torres Strait Islander people, is, in bald terms, turning poverty into an industry.

## Question on components of the Indigenous Evaluation Strategy

*Do you agree with the main components of an Indigenous Evaluation Strategy suggested by the Commission? Should other components be included? If so, why?*

- ① CATSINaM members do not agree with the suggestion because:
  - embedding evaluation is a first world problem and Aboriginal and Torres Strait Islander people are facing the highest levels of homelessness of any people in Australia;
  - focussing on administrative processes as opposed to interpersonal outreach or home-based care allows more reporting on ‘the problem’ and burns scarce resources for responding to the impact of poverty;
  - ‘embedding evaluation’ generates a ‘white collar’ bureaucracy with questionable links to social welfare matters which impact on and exacerbate homelessness;
  - setting evaluation priorities is not a material response to the outcomes of national reviews on poverty;
  - an evaluative culture is a facile bureaucratic response to poverty.

## Question on applying the strategy to mainstream programs

*What is the best way to address mainstream programs in the Indigenous Evaluation Strategy?*

- ① CATSINaM members do not support an Evaluation Strategy because ‘four in every five dollars’<sup>2</sup> is already spent on mainstream administration of social welfare programs for Aboriginal and Torres Strait Islander people. A focus on an ‘evaluation culture’ will therefore generate more bureaucracy and have less social impact on the causes of poverty.

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<sup>2</sup> See p5, Issues Paper

- ⑥ A ‘living document’ is a contradiction in terms and words on paper do nothing to distribute scarce resources to person’s who have no function in bureaucratic parlance.

### Question on government programs

*What lessons from these and other major Australian Government programs impacting on Aboriginal and Torres Strait Islander people would be useful in developing an Indigenous Evaluation Strategy?*

- ⑥ CATSINaM members do not support an Indigenous Evaluation Strategy because it duplicates the functions of, for example, the Health Performance Framework; the Australian Institute of Health and Welfare; the Australian Bureau of Statistics and targeted health and medical research.

### Questions on evaluation approaches and methods

*Which evaluation approaches and methods are particularly suited to policies and programs affecting Aboriginal and Torres Strait Islander people?*

- ⑥ CATSINaM members do not support evaluation as an intrinsic aspect of policy and program delivery because the business framework which supports quality monitoring /evaluation derives from ‘for profit’ economics.

*What factors (for example, circumstances or program characteristics) should be considered when choosing the most appropriate evaluation approach or method, and why?*

- ⑥ CATSINaM members advocate for an approach where cyclical national program review supersedes evaluation because the funds available for health programs, nutrition, education, food security, alcohol education and rehabilitation are so limited.
- ⑥ CATSINaM members support this approach because evaluation in applied terms generates more information about ‘the problem’ and allows welfare spending to be directed to administration as opposed to actual welfare.

*Which evaluation approaches are best suited to encouraging self-determination and valuing Aboriginal and Torres Strait Islander knowledges? Why are they suitable?*

- ⑥ CATSINaM members do not support evaluation in this context because the narrative of evaluation is bureaucracy not welfare.

*In what ways can Indigenous and Western evaluation approaches be successfully combined?*

- ⑥ CATSINaM members do not support the construct of evaluation because it is a veneer as opposed to a social or public good.

*What are the benefits, costs and challenges associated with implementing randomised control trials? What are the most satisfactory alternatives and why?*

- ⑥ CATSINaM members do not believe there are less costly or better alternatives to randomised control trials. This is because levels of complex co-morbidity in the community necessitate studies which validate or not the benefit of a given clinical regime to persons with complex comorbidity.
- ⑥ CATSINaM members support the continuation of randomised control trials because they may validate a benefit of care for persons who would otherwise be deprived of medical care.

## **Questions on the challenges of evaluation**

*How can the challenges and complexities associated with undertaking evaluation be overcome – both generally, and in Indigenous policy specifically?*

- ⑥ CATSINaM members do not support the assumption that evaluation is an indispensable and or intrinsic aspect of policy and program development or delivery. For example, Australian Audit Office reports, Discussion Papers, AIHW publications, ABS publications are just a few of the sources for detailed local and national information. This information is updated regularly and is generated from rigorous accountability standards. In this context evaluation is a redundant and duplicating corporate function which has negligible impact on the social capital of socially marginalised people.

*In what circumstances is evaluation of policies and programs unlikely to be feasible or cost-effective?*

- ⑥ CATSINaM members support national review processes which reduce the capacity of service deliverers to produce nebulous information which in the main, may just repeat the content of corporate key performance indicators.

## **Questions on evaluation practice in Australia**

*To what extent do Australian Government agencies currently undertake policy and program evaluation? How does this vary across agencies? Approximately what proportion of evaluations are made public?*

- ⑥ CATSINaM members support an administrative system where the maximum of social welfare funds reaches the people who require it as opposed to these funds being absorbed through administrative functions which have no impact reducing the causes of poverty.

*What are the strengths and weakness of current evaluation systems and practices across Australian Government agencies? Can you provide examples of good and bad practice?*

- ⑥ CATSINaM members do not support the approaches to evaluation as outlined because none have a ‘common good’ ethical underpinning.

*What can we learn from evaluation systems and practice at the state and territory level?*

- ⑥ CATSINaM members believe we can learn that evaluations have minimal if any impact on the causes of poverty.

*In what ways are Aboriginal and Torres Strait Islander people and organisations contributing to policy and program evaluation?*

- ⑥ CATSINaM members participate in surveys, review, task forces, Royal Commissions and submissions, all of which tend to expose evaluations as partial and costly duplications of planning processes.



*How do we better enable Aboriginal and Torres Strait Islander organisations to lead evaluation and strengthen their evaluation capability?*

- ⑥ CATSINaM members support Aboriginal and Torres Strait Islander organisations being free of evaluations because these functions are paternalistic and patronising when the lived daily reality for the majority of Aboriginal and Torres Strait Islander people is poverty.

*How effectively do government agencies work with Aboriginal and Torres Strait Islander organisations when evaluating policies and programs? What can agencies do better?*

- ⑥ CATSINaM members support an approach where evaluating policies and programs is given no priority because giving it a priority put the focus on ‘what things look like’ as opposed to ‘what’s being done.’
- ⑥ CATSINaM supports an approach where the proscriptive governance is replaced by an inter-personal welfare system where people, as opposed to ‘living documents’ take precedence.

## **Questions on evaluation overseas**

*What lessons can we learn from evaluation arrangements in overseas jurisdictions? And*

*Are there any particularly beneficial international models for the evaluation of policies and programs affecting Indigenous people? What makes them effective?*

- ⑥ CATSINaM members support an approach to welfare programs where the focus is on relief of poverty. In this context programs which are for the ‘public good’ do not require evaluation, they require unquestioned maintenance.

## Questions on Relevant Principles for an Evaluation Framework

*What principles should be included in an Indigenous Evaluation Framework to be used by Australian Government agencies? And*

*How should an Indigenous evaluation framework differ from a general evaluation framework for government policies and programs?*

- ① CATSiNaM members support a governance system where something which is imposed as the rationale for improving social circumstances is not named the thing it purports to address. In this context, the Evaluation Framework is not 'indigenous', it is corporate.
- ① CATSiNaM members support a system which recognises the reality of the need for welfare such that the systems which administer welfare do not evaluate something which has already been established as 'for the public good'.

## Questions on Planning for Evaluation early in the Policy Cycle

*To what extent is evaluation planned for during the design and development of policies and programs affecting Aboriginal and Torres Strait Islander people?*

*Is evaluation funded out of program budgets or from a central evaluation budget within agencies? And*

*What are the key actions and decision agencies should take when planning early for evaluation?*

- ① CATSiNaM members posit the evaluation function is an insidious predator of program and welfare funding such that the construct fuels the myths about how much welfare Aboriginal and Torres Strait islander people receive.
- ① CATSiNaM members do not support an evaluation component in programs and policies because such evaluation is not independent, it is driven by the way an organisation wants to be seen, not a reflection of what programs actually reach those in poverty.
- ① CATSiNaM members support a response to national reviews which is outside evaluation because processes which continue to put the onus of 'justification' on 'the public good' are parasitical aspects of welfare distribution.

## Questions on Incorporating Indigenous Perspectives into Evaluation

*How are Aboriginal and Torres Strait Islander knowledges, perspectives and priorities currently incorporated into the design and conduct of Australian Government evaluations of Indigenous-specific and mainstream policies and programs? How could this be improved?*

*What are the barriers to further increasing engagement with Aboriginal and Torres Strait Islander people during Australian Government evaluation projects?*

*How can the costs to government and communities of engaging more meaningfully with Aboriginal and Torres Strait Islander people during evaluation be better integrated into existing and future program and evaluation budgets?*

- ⑥ CATSINaM members support an approach where the heterogeneity of Aboriginal and Torres Strait Islander populations is recognised. The expectation that engagement from people is necessary reflects a regime where the justification for the need for welfare drives the processes.
- ⑥ CATSINaM members support a system where poverty is not administered like a ‘for profit’ industry.

## Questions on the Independence of Evaluations and Evaluators

*What degree of independence between evaluators and policy makers/program delivery areas is necessary and/or desirable? And*

*What are the advantages and disadvantages of existing Australian Government contracting and procurement arrangements for managing relationships between agencies and external evaluators and ensuring high quality and objective evaluation?*

- ⑥ CATSINaM members support an approach where national reviews or Senate Inquires underpin welfare programs so that the petty bureaucracy which continues to set the pattern for the social marginalisation of Aboriginal and Torres Strait Islander people is abandoned.

## Questions on Ethical Evaluation

*How do Australian Government agencies currently deal with ethical issues associated with evaluation? And*

*Do existing ethical guidelines for evaluations and research provide sufficient guidance for evaluation commissioners, evaluators and participants in evaluations of programs affecting Aboriginal and Torres Strait Islander people? To what extent should the Indigenous Evaluation Strategy build in these guidelines? And*

*In what circumstances should evaluation projects be subject to formal ethics review? In what circumstances should evaluation projects be exempt from formal ethics review? And*

*What are the time and cost implications of embedding an ethics review process into Australian Government evaluations?*

- ⑥ CATSINaM members support an approach where evaluation is not used as a substitute for responding to the findings of Royal Commissions and national reviews.
- ⑥ CATSINaM members support an approach where the ‘culture of evaluation’ is replaced by a culture of person-to-person social interaction so that the funds directed to build ever deeper social surveillance is suspended in favour of public good institutions with no function in evaluation.
- ⑥ CATSINaM members support a system which recognises the need for activities which result in access to basic services for all people. The endeavour of making evaluation ethical fails the public good test because there are so few Aboriginal or Torres Strait Islander persons who stand to benefit from the processes in flow.
- ⑥ CATSINaM members support an Australian Government regime for administering the social welfare of Aboriginal and Torres Strait Islander people which is outside the governmentality of the corporate sector.

## Question on Cultural Capability

*How can the cultural capability of evaluation commissioners and practitioners and their respect for Aboriginal and Torres Strait Islander culture, knowledges, history and values be demonstrated and improved?*

- ⑥ CATSINaM members support an approach where existing evidence is used to direct funds to the relief of poverty and regeneration of Country as opposed to empty administrative functions.

## Questions on Evaluation Methods and Data

*What types of evaluation approaches and methods are currently used to evaluate Indigenous programs? How could evaluation methods be improved to ensure robust and reliable evidence is produced? And*

*To what extent does a lack of high-quality, accessible data, including data gaps, act as a barrier to undertaking effective evaluation of policies and programs affecting Aboriginal and Torres Strait Islander people?*

- ⑥ CATSINaM members do not support strategies within social welfare which allow clichés about data quality and robust and reliable evidence to wither the programs which are needed to respond to poverty of the community.

## Questions on Evaluation Transparency

*What are the current arrangements and requirements (if any) for publishing Australian Government evaluation reports? How are agencies held accountable for responding to evaluation recommendations or findings? And*

*Should all evaluation reports be published? In what circumstances might it be appropriate to not publish evaluation reports? And*

*What mechanisms currently exist for sharing evaluation results and data with Aboriginal and Torres Strait Islander evaluation participants? Are these effective? How could they be improved? And*

- ⑥ CATSINaM members recognise that outside of scrutiny from United Nations committees, domestic Australian Government policies in Aboriginal Affairs, have not given consideration to the social situation of Aboriginal and Torres Strait

Islander people. In this context, undertaking an Evaluation Strategy which inculcates quality monitoring in social and welfare administrative systems, is to support a poverty industry. This is different in kind to accepting that social welfare for Aboriginal and Torres Strait Islander people will always be the legacy of colonial conflict.

- ⑥ CATSINaM members support an approach where the appropriation of funds for the social welfare of Aboriginal and Torres Strait Islander people is not wasted on more reports about the need for social welfare.

### **Question on the Key Enabling Mechanisms for Effective Evaluation**

*What supporting features and arrangements are important for the successful implementation and operation of a principles-based Indigenous evaluation framework and accompanying list of evaluation priorities?*

- ⑥ CATSINaM members support an approach where the expediency of administration is not prioritised over national social determinants of health action which is required to respond to the poverty across Aboriginal and Torres Strait Islander communities.

### **Questions on Determining Evaluation Priorities**

*What principles should be used to determine evaluation priorities? And*

*What policies and programs affecting Aboriginal and Torres Strait Islander people (or broader policy and program areas) should be the highest priority for evaluation, and why? And*

*How often should evaluation priorities be reviewed? How should the process for reviewing priorities be structured?*

- ⑥ CATSINaM members support an approach where the principle is, the social welfare of Aboriginal and Torres Strait Islander people is a public good. In this context there is no debate about priorities – these have been identified over the decades and have not changed in the main because the administrative processes for welfare take priority over welfare itself.

- ⑥ CATSINaM members do not support evaluation reviews or other convoluting bureaucratic processes which avoid the real issue, which is that the administration of Aboriginal Affairs needs to avoid corporate governance processes.
- ⑥ CATSINaM members support the administration of social welfare for Aboriginal and Torres Strait Islander people as a national public good. An Evaluation Strategy allows social welfare to be administered from the perspective of the 'best evaluation practice': how does this have any impact on for example, homelessness?

### Questions on Improving Evaluative Culture, Capability and Capacity

*How much scope do you consider there is to improve evaluative culture, capability and capacity for both those who undertake evaluations, and those who participate in the evaluation process? And how might improvements be achieved? And*

*What resources are currently available to build and strengthen evaluative capacity among program implementation staff, service delivery organisations and community stakeholders? And*

*What impediments are there to improving evaluative culture, capability and capacity and what can be done to address these?*

- ⑥ CATSINaM members support an approach where the language for evaluation does not import concepts from social science in order to be seen as a benign and needful aspect of welfare.
- ⑥ CATSINaM members work in the frontline of welfare services where the level of need in the community is overwhelming. To patronise these workers in a way where the contention is - if they understand evaluation they provide the community with a benefit - is like talking up the benefits of shampoo to a bald person.
- ⑥ CATSINaM members recognise that the biggest impediment to community functioning is the scarcity of welfare services and resources and the biggest impediment to sustainable welfare is loss of habitable land.

- ⑥ CATSINaM members support strategies which are for the world today and focussed on ameliorating the level of deprivation which is experienced by Aboriginal and Torres Strait Islander people.

### **Question on Data for Evaluation**

*To what extent are current data governance arrangements effective? What can be done to improve arrangements?*

- ⑥ CATSINaM members do not support strategies which focus on more data collection when the most critical issues for Aboriginal and Torres Strait Islander people are daily living struggles.

### **Questions on Identifying and Translating Knowledge from Evaluation**

*What can be done to ensure that knowledge generated through evaluation is identified and translated in such a way that it can be used to usefully and meaningfully inform policy design and implementation?*

- ⑥ CATSINaM members support an approach where the findings of national reviews and Royal Commissions are acted on as opposed to a business approach where administrators absorb the greater part of the welfare which is intended for Aboriginal and Torres Strait Islander people.

### **Questions on Evaluation Monitoring and Compliance Mechanisms**

*What approaches and models could be implemented to ensure that Australian Government agencies comply with the Indigenous Evaluation Strategy?*

- ⑥ CATSINaM members do not support an Indigenous Evaluation Strategy because it is a business response to the reality that social welfare may always be an implicit part of Aboriginal and Torres Strait Islander peoples' lives because it is a public good remedy for racism.
- ⑥ CATSINaM members support Australian Government agencies administering programs for Aboriginal and Torres Strait Islander people as a public good, not as corporate modelling.



*How do you think the process for reviewing and revising the Strategy should be structured?*

- ⑥ CATSINaM members do not support a ‘big brother’ level for evaluation because no amount of evaluation reduces poverty.

### **Question on Revising the Indigenous Evaluation Strategy Over Time**

*How and who should we engage to maximise community and expert input to this project?*

- ⑥ CATSINaM members do not support the application of business planning approaches to the social welfare of Aboriginal and Torres Strait Islander people.